

QUESTION 1

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| Main Issue | Sub Issue | Summary of Main Issues Raised |
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| Vision, Aims and Spatial Strategy: Question 1 | Agree with of Vision, Aims and Spatial Strategy of LDP2 | <p>The contributors support the main aims of LDP2 (25, 43, 78, 82, 101, 119, 126, 149,153, 171, 174, 179, 181, 183, 187, 190, 192, 210, 214, 215, 225, 228, 230, 236, 253, 255, 259, 263, 274, 280, 283, 291, 293, 296, 299, 301, 312)</p> <p>I support the following aims :</p> <p>Para 3.3 it is stated that 'it is not anticipated the LDP2 will require a significant number of new houses'. Para 3.5 states 'the LPD must seek to encourage diversification of the rural economy by sup-ported appropriate economic development and tourism in the countryside' Para 3.6 states 'the built and natural heritage are major component parts of the attractiveness of the Scottish Borders which must be protected and enhanced.' and 'LDP2 must continue to ensure new development is located and designed in a manner which respects the character, appearance and amenity of the area' Para 3.7 states 'The council must continue to promote and investigate ways to address climate change issues....There is a continuing need to reduce travel, greenhouse gas emissions as well as energy consumption. 3.8 summary includes 'Promote economic development opportunities along the railway corridor' and 'Maximise and promote the Scottish Borders tourism potential and build strong visitors economy' 'Protect and enhance the built and natural environment'. (90)</p> <p>Agree with the proposed strategy encouraging strategic growth within the three Rural growth Areas and in particular the Western Borders / Peebles. (111, 114)</p> <p>SEPA note and welcome that sustainability and climate change are key elements of the vision and that the Council is promoting sustainable development which addresses the issues of climate change adaption is being investigated as part of the SBC's transition to a low carbon economy. SEPA are also supportive of the specific reference to developing heat mapping within the vision for LDP2 as an opportunity, as part of the transition to a low carbon economy and the development of buildings and property which will be resilient to the impacts of climate change. (119)</p> <p>With regard to the Spatial Strategy, SEPA welcome the identification of the potential flood risk and need for a second bridge requirement in Peebles, prior to the release of any further housing land on the south side of the River Tweed. The identification of environmental constraints on high demand areas such as this helps</p> |

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| | <p>with the transparency and consistency of LDPs for both the public and stakeholders. (119)</p> <p>SEPA support the inclusion of making adequate provision for waste management as one of the Local Development Plan aims, and the positive approach taken towards waste management as stated in paragraph 3.8 of page 16 that “<i>The provision of land to deal with waste is also a role for the Plan. Where this involves facilities for recycling or waste reduction, then this in turn will also help to reduce dependence on landfill sites</i>”. SEPA also support the aim for Easter Langlee in Galashiels (Para 3.19, page 17) to improve recycling beyond the existing levels and the opportunity to create the provision of district heating in nearby areas. (119)</p> <p>Yes, completely agree. Especially on the requirement for improved transport links and digital connectivity in the more rural areas. These are essential for existing businesses to flourish and for new businesses to start up. (165)</p> <p>In principle I agree with most of the outlines. (168)</p> <p>Broadly support aims. (178)</p> <p>We support the Council’s ambitions for delivering sustainable development and a low-carbon future. The protection of “natural intrinsic qualities” should place emphasis on natural, indigenous habitats and species (ie, not commercial conifer plantations or introduced, non-native plant and animal species, even when these are perceived to be part of the natural biodiversity or have some nominal aesthetic value to some people). We support the ambitions for an extension of the Borders railway to Carlisle and the provision of a new station at Reston to service the east-coast line. Rail travel can make a major contribution to the low-carbon economy by providing an alternative to road travel and reducing the number of vehicles. (182)</p> <p>Sustainability and climate change – We agree with the provisions listed here. In Annex 3, in relation to policy PMD1 Sustainability it is suggested that the Council considers the integration of the Land Use Strategy with the planning system; this should also be listed in this section to ensure that there are connections between this aim and the suggested change to policy PMD1. (199)</p> <p>We are broadly supportive of the aims described in the LDP2MIR, and in particular ‘promoting development of Brown Field sites’, a subject which is particularly relevant in the context of the Vacant and Derelict Land Taskforce which is being led by SEPA and the Scottish Land Commission. Transforming Vacant and Derelict Land. There is nearly 12,000 hectares of vacant and derelict land in Scotland which is the equivalent to over 9,000 football pitches. It is estimated that a third of us live within 500 metres of a derelict site. In some of Scotland’s cities this figure is much higher, reaching 61% in Glasgow. The Scottish Land</p> |
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| | <p>Commission and the Scottish Environment Protection Agency (SEPA) are working together in an innovative partnership to transform how vacant and derelict land is dealt with. Supporting local authorities to rejuvenate vacant and derelict land brings about long term regeneration and renewal – unlocking growth, reviving communities, increasing community empowerment, reducing inequalities and inspiring local pride and activities. The Land Commission and SEPA have signed a Sustainable Growth Agreement and will use this agreement to focus on the delivery of our shared vision for transforming our approach to vacant and derelict land in Scotland. We are also supportive of the planning authority’s aims of ‘Protecting the Natural Environment’, and Encouraging Tourism and a better visitor economy. We think Policy EP7, respecting Listed Buildings should also be a priority. (212)</p> <p>Broadly agree and it is my opinion that extending the Borders Railway through to Carlisle in tandem with the definition of a National Park for the Scottish Borders would contribute significantly towards achieving aims such as economic growth, tourism, natural heritage and definition of land designated for housing. (262)</p> <p>Agree with aims. Additional priority should be given to capacity and quality of school and medical facilities. (273)</p> <p>Agree - however there should be proposals made regarding the requisite infrastructure improvements. (282)</p> <p>We agree wholeheartedly with the main aims you describe. And have no alternative proposal to put forward. (290)</p> <p>Network Rail supports the vision of the MIR in achieving sustainable growth, and its objectives for communities, the economy and sustainability. The rail network can make a key contribution to achieving the objective of creating a sustainable place which is attractive to live, work and do business in. The importance of the railway to sustainable development and of railway stations to urban regeneration is gaining wider understanding. It is welcomed that the Council recognises the links between connectivity and these placemaking principles, and for the support for economic development opportunities along the railway corridor. Opportunities for housing development and town centre regeneration along the rail corridor and in the settlements with improved public transport links is likewise supported. The importance of the existing and potential rail infrastructure is particularly important given the ageing nature of the population in the Scottish Borders which is forecast over the Plan period. For development plan objectives relying on sustainable transport and improved rail connections to be realised, Network Rail must rely on Plan policy and guidance which ensures the impacts of proposals on rail infrastructure are clearly assessed and that delivery, including funding, responsibilities are clear. The spatial strategy identified in the MIR is likewise supported with the majority of growth within the Central Borders Rural Growth Area which is served by the Borders Railway. This provides a focus for development in the most sustainable locations capitalising on the</p> |
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| | | <p>improved public transport links both within and beyond the Scottish Borders area. (294)</p> <p>Scottish Water supports the Council's vision, aims and spatial strategy. We will continue to work closely with the Council to ensure we continue to maintain a high level of service to our existing and future customers whilst protecting our assets. We will ensure that we align our investment where it is required as we progress through to LDP2 and beyond. Scottish Water is fully committed to working with communities whilst we deliver the investment required to reduce any potential impact. We will provide the necessary capacity at our works to support economic growth and deliver this in the most sustainable way possible. We broadly support the Main Issues Report and our views on each of the questions within our remit, is given below. Scottish Water acknowledges that some of our treatment works have limited capacity. We would encourage developers to engage with us early to ensure we can target specific strategic investment where it is needed at the right time. Where there are existing Scottish Water assets, within a proposed site, again, we would encourage early engagement to ensure these assets are protected to ensure we maintain services to our customers. (323)</p> |
| <p>Vision, Aims and Spatial Strategy: Question 1</p> | <p>Disagree with Vision, Aims and Spatial Strategy of LDP2</p> | <p>The contributors disagree with the main aims of the LDP2 (95, 158, 170, 175, 184,193, 194, 268, 204)</p> <p>Paragraph 3.8 of the MIR Summary states objectives to ' Promote economic development opportunities along the railway corridor'. The only proposal for development which directly relates to this is a 2.5 ha site in Galashiels (BGALA006) which is absolutely trivial. So the MIR fails on this objective. (90)</p> <p>Whilst agreeing with the strategy to provide a generous supply of housing, although object to the suggestion that LDP2 will not require a significant number of new housing sites. The strategy to identify preferred housing sites on sites outwith strong market areas, and with potential constraints, is flawed given the potential risk to delivery. It is recommended increased provision in areas where people wish to live. The submitted site at Whitehaugh in Peebles should therefore be brought forward as an allocated site in LDP2. Whilst agreeing Peebles has a strong housing market it is disagreed a new bridge is required before further development can take place on the southern side of the River Tweed. (111, 114)</p> <p>I agree with some but the fundamentals of improving areas for business don't work without infrastructure. Housing can't just be added in such a way. We need more doctors surgeries, larger school and vastly improved roads (although not space to increase road capacity in most of Peebles). (200)</p> <p>This development has clearly not been thought through. By erecting 240 houses you will be increasing the population of Peebles by about 7 -10 % depending how many families move in. Does the town have the capacity to take this extra capacity. In terms of Schools, (the high school is nearly full). Sewerage and general services and extra traffic as most of the people who live there will be working in Peebles or</p> |

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| | <p>Edinburgh. Will the Glentress bikers take kindly to a big housing estate being built right next to them, has a survey been done there, it is the biggest tourist attraction and therefore a big money spinner for the town. There are other sites closer to Peebles that can be used before Eshiels is considered surely. I do not agree with this development. (203)</p> <p>The aims of the LDP2 are hard to challenge in principle but the chosen housing proposals to satisfy expected demand seem excessively focussed on Peebles, rather than developing towns along the new Borders Railway. It is almost as if major housing developers have pushed for housebuilding where profit is maximised, without considering the capacity of existing infrastructure: health services, schools, commuter route congestion etc. (209)</p> <p>I don't agree with the aims. Building work areas will not improve employment and prosperity. Kings meadows industrial estate is an example. All full of little businesses that employ a few people. There is not a deficit of housing in the Peebles area. What you are hoping to supply is expensive housing for people out with the Borders to move to. There is no plans to improve transport. There is one bus and no train. There is no plans to build a bridge or any other road improvements. It will spoil tourism by taking away the one thing tourist came for - the beautiful unspoiled countryside. (235)</p> <p>No, I don't think it takes into account the key economic drivers for the local economy, namely tourism, nor the requirement for genuine low cost housing. The LDP2 seems to be driven by a desire to satisfy developers drive to higher profits rather than exercising any power to drive a broader vision. (239)</p> <p>Agree mostly. Feel SBC must take some steps to: make sure that the infrastructure matches the increased population any development brings to the area before the development takes place. In the main the existing and anticipated economic growth is based on tourism which includes mountain biking, hill walking and other outdoor pursuits. How can building on the fields, and ruining the scenic/rural views in Eshiels, Cardrona and Innerleithen enhance the plan for rural development? This is counter to SBC policy ED7 of encouraging tourism. Take a more forward thinking and pro-active approach to environmentally sustainable housing design. How is SBC planning taking into account the change in age demographic? The population is set to increase by 1.5% over the next 10 year period...but the 65-74 and 75+ age groups is 6% and 31%. (207)</p> <p>I generally agree with the aims of growth and creation of sustainable communities and growing the Scottish Borders economy in a sustainable way. Clearly it is important to ensure that the infrastructure is in place in advance to meet an increased population ; How is the SBC planning to deal with the changing Borders demographic i.e. an ageing profile?; As a family we are considering the purchase of an electric car but need confidence that there will be sufficient electric-car charging points. We need a more pro-active approach to environmentally sustainable house design e.g. solar panels, heat pumps rather than fossil fuels etc. We are</p> |
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| | <p>keen mountain bikers and the economic growth from tourism relating to mountain biking in the Tweed Valley and in particular around Glentress & Innerleithen is impressive. Housing and commercial development immediately surrounding Glentress should be considered carefully as we do not want biking tourists feeling they are no longer "in the countryside". Building on the open fields, and ruining the scenic vista's in Eshiels, Cardrona and Innerleithen would damage the rural development plan? It is counter to SBC policy ED7 of encouraging tourism. The SBC Spatial Strategy Staes "... success of outdoor recreational facilities at Glentress has helped tourism" and "The Scottish Borders has outstanding scenic qualities within its landscape and planning policy seeks to protect it." This doesn't seem to be the case! We don't want to kill the goose that lays the golden eggs! (216)</p> <p>I consider that the MIR affords too much emphasis to the rural growth areas, to the detriment of other areas in Scottish Borders, and to the detriment of all of Scottish Borders. There is a need for much greater flexibility outwith rural growth areas. (264)</p> <p>It is increasingly evident in today's rapidly changing society and economy that the concept of sustainability, and the concomitant belief that sustainable locations and communities can only be achieved through centralisation, is already discredited and outmoded. This will become more evident through the plan period. A radically different interpretation is needed of what sustainability means in a planning context. (264)</p> <p>The concept of sustainability as advanced in strategic planning policies is already discredited. A different view is needed of what sustainability means in a planning context. The extent to which the planning system can control lifestyle changes which govern what is and what is not sustainable ought to be recognised. (265)</p> <p>The Borders needs development but the strategy to place the majority of it in Peebles is flawed and will put unacceptable pressure on local resources and infrastructure. I would suggest that the new railway link in Galashiels should be better utilised as that was the reason it was built, and appropriate development should take place there. The environment would of course need to be improved and the town made more attractive to encourage commuters to live there, but this can be done with sensible planning and budgeting. (271)</p> <p>The stated vision in part states that people should afford a home near where they work. This scale of this plan suggests economic development on a scale highly unlikely to be achieved in Borders. SME development in mixed usage developments will not bring the employment opportunities local to home for current population never mind the aspirations of addition 3800 households In the main the current and anticipated economic growth is rooted in tourism including mountain biking, how can building on the open fields, and ruining the scenic vista's in Eshiels, Cardrona and Innerleithen enhance the rural development plan. No mention in this document about the demographics shifts and aging populations needs, the current LDP states need for 50 extra supported housing units, no mention of a projection in this MIR.</p> |
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| | | <p>Environmentally sustainable housing designs should be a given in any new build wherever the location. (276)</p> <p>No I don't agree. The town (Peebles) is already bursting at the seams and everybody knows that. (285)</p> <p>The MIR states that the LDP2 must incorporate a generous supply of housing land for a range of users (para 3.3). The built and natural heritage of the Borders must be protected and enhanced (para 3.6). We agree with this sentiment. We also agree that new developments should be located and designed in a manner which respects the character, appearance and amenity of the area (para3.6). The proposals as they affect Peebles and the surrounding area including Eshiels and Nether Horsburgh do not achieve this nor could any clever design achieve this. Para 3.7 discusses the need to reduce travel and greenhouse gas emissions, how these reductions can be achieved by locating large development well away from what infrastructure that exists is something of a mystery. (318)</p> <p>Whilst the aims of the LDP2 are to identify suitable sites for housing and economic use within the <u>whole</u> of Scottish Borders are perfectly reasonable, we are concerned at the disproportionate allocation of sites in and around Peebles. (318)</p> <p>With all that has been written in the SESPlan and in various SBC documents, the central Borders requires significant investment and regeneration, hence the development of the Borders railway and its vital connection to Edinburgh. It should therefore be fairly obvious that the majority of housing development should occur close to transport infrastructure. Peebles does not enjoy the level of connectivity that the central Borders has with Edinburgh. It should be very clear to planners that the only link between Peebles and Edinburgh is the A703 to Leadburn and then with a choice of two routes. This road is highly susceptible to adverse weather conditions and it is not uncommon for the town to be cut off in winter. Accidents can occur at any time resulting in road closure without any easy alternative routes available to commuters. To suggest that this route is a suitable main thoroughfare for the increased levels of traffic that such development will generate does not engender confidence in long term planning. We know that, currently, over 60% of the working population of the Peebles area works outwith the town; most of these people rely on cars as their main mode of transport, others rely upon the bus services. Without significant improvement in the roads infrastructure further development would be deleterious. (318)</p> |
| <p>Vision, Aims and Spatial Strategy: Question 1</p> | <p>Proposed alternative or additional aims</p> | <p>The contributor wishes to see a more long-term thinking in the vision, aims and spatial strategy of the new LDP. 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. There is no mention of improved connectivity between the central hub and eastern and western links between them. The A72 between Peebles and the central Borders is a weak link in both directions. Further improvements would be welcome. (7)</p> |

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| | <p>At present the MIR has the following aims: - growing our economy; planning for housing; town centres; rural environment; built and natural heritage; & sustainability and climate change. These are all strong aims to include in any plan, however I would suggest in addition we include: - Improve attraction of the Borders (tourism / accommodation); & enhance transport links. (24)</p> <p>Properties should be built on land that is already up for sale. (27)</p> <p>In para 3.2 should be amended to state “Improvements to the road network and public transport must continue to be supported <i>..in particular to ensure that the existing Borders railway and its future extension can make an increasing contribution to the growth of the economy and can encourage modal shift to reduce reliance on the private car</i>”. (45)</p> <p>The listed buildings of the Scottish Borders are one of its great assets. The existence of a listed building should not result in the sterilisation of any land within sight of it. Buildings erected in sight of a listed building must be designed to relate sympathetically to that building. Specifically, they should not usually be of more than 2 storeys, should be coloured to match the local stone and should usually be of traditional design. (93)</p> <p>The MIR/emerging LDP2 are considered in the context of “Infrastructure, Transport and Sustainability” in paragraphs 2.6-2.15. This summary omits reference to two industries of strategic significance to the Scottish Borders given its location: (i) the emerging offshore renewables industry; and (ii) coastal industry, ports and harbours. These omissions are reflected in the scarce reference to Eyemouth Harbour throughout the MIR, references being limited to a single mention of the location in the context of the fisheries industry and tourism, which combined are only part of Eyemouth Harbour’s potential from economic development and economic growth perspectives. Reference to Eyemouth Harbour as a location of local and regional significance to a range of industries, potentially including the offshore renewables sector, is similarly absent.</p> <p>i. A new sentence should be inserted within existing paragraph 3.2, under the existing heading “Growing our economy”, as follows: “Further, the LDP2 should facilitate development associated with the growing offshore renewables industry, in particular that which is dependent upon the strategic significance of the Scottish Borders’ ports and harbours, and which contributes positively towards the economic development of such coastal locations.”</p> <p>ii. Amend the “Rural environment” heading to “Rural and coastal environment” and include within paragraph 3.5 the following sentence: “Reflecting the strategic significance of the Scottish Borders coastal towns, the LDP will support appropriate development in coastal locations including at and surrounding Eyemouth Harbour, which promotes economic development opportunities whilst continuing to safeguard the coastal environmental”;</p> <p>iii. At paragraph 3.8, under the “Growing economy” heading, include:</p> |
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| | <ul style="list-style-type: none"> • “Promote economic development opportunities at ports, harbours and other coastal locations, including those related to the offshore renewables industry.” <p>iv. In the spatial strategy as it relates to the Berwickshire RGA, amend the penultimate sentence in respect of Eyemouth Harbour to read: “It continues to function as a working fishing port with an important tourism role, with potential for growth and diversification linked to the offshore renewables industry, as well as other complementary industries. Such growth and diversification could benefit from the extant planning permission for a helicopter access facility adjacent to Eyemouth Harbour.” (109, 110)</p> <p>Text amendments are proposed which generally relate to the promotion of economic development opportunities at ports, harbours and other coastal locations, including those related to the offshore renewables industry. Specific reference to Eyemouth is given. (109, 110)</p> <p>Recommend that the expansion and improvement of green network opportunities and links is expanded to state blue/green networks opportunities. Blue/green networks are the integration of water and drainage management interventions to green networks in order to deliver benefits to the environmental status of existing and proposed sites and provide opportunities for place making and associated environmental and social benefits, including improved biodiversity, resilient to extreme weather events and improved health and wellbeing. (119)</p> <p>The LPD2 should build in a specific requirement regarding preserving wildlife habitats, and preventing habitat pockets from become even more isolated. (146)</p> <p>I believe a key aim should be to have the necessary social and physical infrastructure in place before development starts - utilities, roads, schools and GP capacity. (150, 151)</p> <p>We welcome that you have identified protection and enhancement of the built heritage as a main aim of the emerging Local Development Plan 2. As the plan progresses, we encourage you to consider how the historic environment (designated and non-designated) can contribute positively to other aims such as good placemaking, regeneration, and attractive and sustainable communities. (164)</p> <p>I agree with the LDP in general terms and recognise why the plan is required. However, I have concerns that additional development such as housing will lead to an increase in local populations which will place unsustainable demands on local facilities, services and infrastructure. All too often development takes place which is not matched by necessary increases / improvements in service / infrastructural capacity - roads / footpaths, transport services, medical and other social / community services, car parking etc. Essentially, this additional provision should be in place before development takes place or should, at least, be simultaneous. (166)</p> |
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| | <p>Broadly support aims. However, the area infrastructure must match the needs of the increased population after development, BEFORE development takes place. The plan must take account of change in age demography. The population is to increase by 1.5% over the next 10 years, but the increase in 75-74 age groups will be 6%, and the over 75 by 31%. How is SBC planning for this. Current and estimated economic growth in the Borders relies heavily on tourism, including mountain biking. Building on open fields will surely ruin the scenic vista in Eshiels, Cardrona and Innerleithen, and will not enhance the rural development plan. (172)</p> <p>We agree with the aims. We would add the caveat that conservation and enhancement of our unique landscape and countryside should feature prominently in the achievement of those aims. (173)</p> <p>Agree on the whole. However, housing design needs to take into consideration new technology such as electrical car charging points, wind and solar. Building new houses beside growing tourist destinations such as Glentress will cause light pollution, and will have a negative impact on the customer experience of the tourist attraction. Any anticipated population growth due to housing must surely have to be planned for with adequate levels of investment in supporting infrastructure & services. (185)</p> <p>While appreciating the vision statement is taken from the SESPLAN it has to be said that it is very generic and could really apply to any rural area in the UK. The third aim under communities appears to lack a verb? "Encourage" or "plan" might suit. The second point under growing economy refers to promoting economic development along the railway corridor - but surely we should be promoting appropriate development across the three rural growth areas (if not the whole region) - perhaps especially along the railway? While there is an ambition to promote economic development there is no reference to promoting social development eg healthy, dynamic, enterprising communities? We consider the stated aims to be reasonable but we see them as unambitious. For example, there is an urgent need to reduce waste and to increase recycling. The aim of "making provision for waste management" is too passive. Likewise, "improving connectivity" is very passive. The need is to do everything possible to ensure that 100% properties have access to superfast broadband within a reasonable timeframe. 3.7 makes the point that action is needed to address climate change and promote a low carbon economy but there is no aim referring to community-based renewable energy. Should we not be aspiring to seeing more communities producing more of their own energy to help meet Govt, National and International targets? The report implies that the opportunity for more local renewable energy is limited by grid capacity, but this need not be the case if smart grid technologies are adopted. Would it be possible to seek to ensure that all new housing is designed to require minimum heating and to generate as much renewable energy as possible (eg aligned to face south and incorporated solar panels). The same should of course apply to new public buildings such as the tapestry building and the proposed developments at Tweedbank. Adapting the right design and technologies ought</p> |
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| | <p>to be reducing the need for heating in new buildings to a minimum. (196)</p> <p>Aims identified are difficult to disagree with. However, the generality of language used is worrying as it allows for broad interpretations not necessarily properly quantified in the rest of the document. Are the aims hierarchical? ie 'Growing our Economy' preeminent? ' I would add:</p> <ol style="list-style-type: none"> 1. Integrity of approach - planning committee really looks at impact on their suggested areas for industrial and housing development in reality rather than as a box ticking exercise having 'talked to' eg transport, education, health who have no real idea of what is happening on the ground but rely on sets of statistics 2. Ensuring equality of impact of aims of LDP2 across the borders ie not being in the thrall of developers and going with what is best for them but unfair in particular areas either because they are ignoring any building or development for economic growth in some areas which would welcome and benefit whilst swamping other areas eg large number housing planning in a small number of places rather than an equitable divide 3. Effective joined up thinking ie working with a range of partners is not a stated aim although the inference is there and examples are mentioned throughout the document. What about , in addition, eg talking to Forestry Commission, Mountain Bike Centre etc looking at current planning eg 5 years against forward planning eg for 10 or 20 years eg railway corridor. (197) <p>There needs to be a more holistic approach which considers the bigger picture - particularly with regard to the infrastructure within the area - which frankly is currently underfunded and already wholly inadequate for the current population without the further development planned under the LDP2. I am also very concerned that the Borders countryside, which is revered as an area of natural beauty, could be ruined by some of the proposals outlined within this plan. There are a number of examples of rural areas which will be blighted by proposed mass development, thus threatening the visitor footfall in the future. (201)</p> <p>We generally agree with the main aims of LDP2. We suggest a couple of minor changes to help these align with detail presented in the MIR and its SEA:</p> <ul style="list-style-type: none"> • Change the Communities aim of “Encourage better connectivity by transport and improve digital networks” to “Encourage better connectivity by sustainable transport and improve digital networks”. We suggest this change as ‘transport’ could imply private and motorised vehicles only and therefore may not fully reflect the transport hierarchy. The MIR is clear that solutions including improved public transport and active travel will be sought and we consider that this amendment helps to highlight this. • The Sustainability aim to “Encourage better connectivity” could be expanded on. We are unclear on what this encompasses. • We recommend that the Sustainability aim of “Extend and improve green network opportunities and links” is amended to “Maintain, extend and improve green network opportunities and links”. The addition of |
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| | <p>maintain would more clearly highlight that there is a positive existing resource in the Scottish Borders. (213)</p> <p>As far as the Built and Natural Heritage aim is concerned we would suggest that the way this is worded is not so much an aim, more a continuation of business as usual. In public service language an aim must seek to take us from where we are now to some better place, or a better position. To be part of a development plan this particular aim should therefore seek to develop and advance the protection and enhancement of our rich built and natural heritage. There are clearly several ways to do this but we would argue that the best way, the cheapest way for the Scottish Borders, the one which has most evidence to back up that claim, and the one with considerable popular support, is to have a significant part of the Scottish Borders designated as a National Park. (218)</p> <p>There is no mention in the vision about services and infrastructure in towns. In particular there is no vision about how health and social care services will be maintained never mind improved. (220)</p> <p>Agree with the main aims of the LDP2. There are a few areas which I would like to see more emphasis, focus, action and investment as detailed below:</p> <ul style="list-style-type: none"> * Education and schools: this is so important for our children's future and so many local schools seem to be struggling with underinvestment and overcrowding * Transport - major investment needs to be made into our dilapidated road network and I would like to see ambitious plans to extend the Borders railway network throughout the region * Local jobs for young people - let's find a way to encourage larger employers to set up in the borders supported by better transport links, schools and infrastructure. (221) <p>I believe that more needs to be done to regenerate a new sustainable industrial base in Peebles to ensure future prosperity for its residents without the need for them to travel to find work. I also firmly believe that more needs to be done to develop a sustainable travel corridor between Peebles and Edinburgh to assist commuters. It would only take 17 miles of railway to achieve this which is much less than was invested in the Borders Railway for far fewer daily commuters. It is estimated that around 6000 journeys are made each day by commuters to Edinburgh from Peebles and so a train service, preferable electrified using wind generated energy is the way to go. (222)</p> <p>Broadly support, but there seems to be little ambition in terms of developing the conservation of Borders landscapes in order to capitalise on initiatives based on the commercial value of this great asset. (234)</p> <p>At first sight the main aims may seem reasonable to think of strategic growth. However there are some apparent and pressing issues within the Peebles area. Any expansion of this local area will need more considered infra structure - there seems to be an assumption that this is part of the Edinburgh plan but</p> |
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| | | <p>commuting to Edinburgh from Peebles is becoming increasingly complicated with the demands on road usage and volume of traffic. There is very little in the way of a direct train route that can mitigate against this. The main road to Edinburgh takes people to the Leadburn junction- fraught with accidents without any further increase in traffic which would come from more development in Peebles. I would ask the planners to consider the existing infrastructure requirements and explain how this could support an expansion of housing. Although I can see that Peebles could be attractive- lucrative even for housing developers, I would ask has money been a prime driver here in thinking of expanding developments rather than the community need? Has the community need for more housing been researched and thought through? There seems to be little in the way of a concrete data analysis. There are limited brown field development sites in Peebles - again this means expansion beyond the existing town centre with little. (243)</p> <p>It is important that local people directly benefit from efforts to improve sustainability. I note that recycling does not seem to be considered here. I agree that we need to reduce fuel poverty and support local householders. I am less convinced that there is a need for super sized wind turbines- we need to remember that there is a natural beauty in the Scottish Borders and tourists as well as local people enjoy this environment. The only reason that size have been mentioned is because of reduced profit margins to the businesses involved with them and their profit margins given reductions in subsidies. It would seem to me that there is little benefit in this for local communities. (243)</p> <p>Broadband requires to be upgraded in the Newcastleton area. (245)</p> <p>Agree with the aims but not the methods. (246)</p> <p>Build infrastructure before or at the same time as houses. (247)</p> <p>Agree but no more housing is needed in Peebles. (248)</p> <p>I understand that the possible is not always what ends up happening but I feel that the infrastructure in Peebles needs addressed before any more houses are built. The local Doctors surgery cannot cope with the amount of people in Peebles at the moment. Lack of Dental facilities (non-private). The schools – especially the High School - need upgraded/enlarged. The road system is failing. We need a new bridge. What we don't need are more private housing. We need social housing for the young (and not so young) people in Peebles so that they can continue to stay here. (250)</p> <p>No, I think the council should aim to reduce house building in order to protect the quality of life and character of our fantastic border towns. (251)</p> |
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| | <p>Para 3.10 of the MIR highlights the main population areas and states that these are the primary areas for growth. These must be the focus of activity and provide the revenue source for ongoing development as opposed to development in Peebles, where any development would contradict the Authorities aim of a sustainable, environmentally protective plan by forcing the increased number of residents to use cars to drive to Edinburgh for employment. Development in Galashiels and Tweedbank would be supporting the Borders Railway and satisfy environmental and economic development in those areas. (252)</p> <p>Renewable energy is an area that must be extended. Selkirk lost out to myopic planning and inadequate understanding of the need and was denied a huge community benefit from turbines on Common Good land. Selkirk community stood to gain £100 million + over a 25 year period. That opportunity has now passed. A little more realism is needed. (258)</p> <p>The failure to provide a bypass for Selkirk and the future damage to health of youngsters forced to inhale diesel exhaust on the way to school is wholly reprehensible. (258)</p> <p>In its turn, identification of the bypass route - already preserved for 80+ years - would free up land for housing/commerce and stimulate development in the town. (258)</p> <p>If the council had had more foresight in 2006 when a wind farm was first proposed, many of today's problems would have been averted. The aims are fine. They simply do not sufficiently emphasise a route to success. (258)</p> <p>The vision focuses on economy and tourism as well as housing and development. There appears to be little analysis on what the current gaps are in the rural areas in terms of housing. My own opinions are that rural housing is already unaffordable for those living and growing up in these areas, more needs to be done to stop second homes and holiday homes pricing people out of the market. Similarly there is no focus on encouraging new entrants into farming, no farmers no farm diversification? Farm diversification itself is an issue as it seems to be as soon as you diversify you are penalised by tax or reduction in farm payments but your business would have to pay a lot to subsidise your farm and make a living! There is nothing in the report about responsible behaviour in the countryside and this is a failing of the report given that this is a significant issue in the other two Scottish national parks, and is already a problem in some places in the borders. (260)</p> <p>Support, but it must support a range of enterprises especially locally owned SME businesses. (272)</p> <p>Whilst it is difficult to disagree with these broad based aims without more detailed explanation what does it mean? For example reference to building sustainable communities should in my view include a concept of</p> |
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| | <p>what sustainable means - this isn't just environmental sustainability so it is left dependent on definitions which are absent. (277)</p> <p>Support, however, with regards to Growing the Economy - promoting economic development opportunities along the railway corridor subject to -</p> <ul style="list-style-type: none"> (a) this not being to the detriment of other parts of the SBC area (b) consideration is given to development of the Railway from St Boswells to Berwick upon Tweed (c) request that the former route is safeguarded for future development. (288) <p>Mainly agree, but the area falls sort of many beautiful areas. (297)</p> <p>In theory I agree with the aims of the MIR but I completely disagree with the proposals put forward that focuses most of the potential mixed housing & employment sites/pure housing sites in the Tweeddale area. Given that there is regular reference to the success of the Borders Railway, desire to extend this south to Carlisle, and the mention of the Reston station, why does the MIR ignore these projects when to site additional housing along these transit routes would only make these projects more viable? (298)</p> <p>The aims of LDP2 are in the main fine but the Growing Economy aims should cover the whole of the Borders and not be confined to the railway corridor, indeed there is an argument that extra resource should be available for areas outwith the railway corridor. The 5% not covered by superfast broadband rollout by the end of 2018 will undoubtedly be outside the railway corridor and it will therefore continue to be at a Disadvantage. (315)</p> <p>Two very important Aims that have not been included in the MIR. These are:</p> <ul style="list-style-type: none"> 1: "Ensure that adequate service provision to support new development is in place prior to increasing demand for services by the building of new houses or business units." I see that as a fundamental of good planning. Failure to do so equates to an absence of planning. 2: "New housing provision must take account of the predicted change in the age demographic of the Scottish Borders (Table 2 in the MIR), by promoting land for a specialist development for the most senior age groups. This should be purpose built, in an attractive location, close to the railway and hospital." I believe that SBC are missing opportunities presented by the ageing population. I really believe that if SBC were to identify a suitable, attractive site for such a high quality development it could lead the way within Scotland for a revolution in how coping with an aging population is viewed and tackled. (90) <p>The Scottish Government has also announced, as part of A Plan for Scotland: The Scottish Government's Programme For Scotland 2016-17, that it will bring forward a new Climate Change Bill, including an ambitious new 2020 target of reducing actual Scottish emissions by more than 50%. The proposed LDP2</p> |
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| | | <p>and any supporting supplementary guidance should also make reference to this, and seek to promote and support the measures outlined to achieve Scottish Government’s targets. There will clearly be a need to also support new renewable developments, including new onshore windfarm sites, if these targets are to be realised. (99)</p> <p>With regard to the main aims outlined, we would recommend that the expansion and improvement of green network opportunities and links is expanded to state blue/green networks opportunities. Blue/green networks are the integration of water and drainage management interventions to green networks in order to deliver benefits to the environmental status of existing and proposed sites and provide opportunities for place making and associated environmental and social benefits, including improved biodiversity, resilient to extreme weather events and improved health and wellbeing. (119)</p> |
| <p>Vision, Aims and Spatial Strategy: Question 1</p> | <p>General comments</p> | <p>It is not necessary to suppress travel demand particularly when efforts are being made to grow the economy. The aim is to reduce travel “by car”. The benefits of the Borders Railway should be exploited. (45)</p> <p>The economic development opportunities afforded by the Borders Railway should be reflected by the housing, economic development, sustainability and regeneration LDP policies. (45)</p> <p>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 italics are questions on specific parts of this section to which answers are requested.</p> <p><i>“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”. (73)</i></p> <p>Under ‘Growing Economy’ the encouragement of high value-added employment is critical. I believe that not a single stock exchange listed company has its headquarters in our region. Why is this and what can be done about it. (96)</p> |

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| | <p>SBC need to ensure adequate infrastructure (roads, health centres and GPs, primary and secondary school places, electric car charge points) are provided for before future development takes place. Greater emphasis needed on getting people out of their cars by providing adequate public transport, and cycle lanes independent of roads; A more proactive approach to house design e.g. insisting solar panels are placed on roofs of south facing new builds as a requirement. Such panels are NOT just 'eco-bling' but are an essential part of our sustainable lifestyle in the Borders and elsewhere; The opportunity to maximise and promote tourism will be destroyed by insensitive urbanisation and ribbon development such as the proposed multi-use development in rural areas like Eshiels. (155)</p> <p>Broadly agree, but there seems to be little ambition to pro-actively develop Conservation of the Borders' landscapes and to promote initiatives based on the value of those assets. (160)</p> <p>Agree in general, but we have grave concerns over the proposed preferred development site in Innerleithen adjacent to the health centre (162)</p> <p>We agree that the Local Development Plan 2 should incorporate a generous supply of housing land for a range of users. We note the Council's reference to the "limited take up of allocated housing sites" and we would propose that there are other sites which would be more effective for delivery within the Scottish Borders, including our client's site at Dingleton Mains, Melrose. This site is effective and can be delivered within the short term. (177)</p> <p>Rural environment – as stated in the MIR, Brexit can bring major challenges, but at the same time it provides an opportunity for integrated land management, and diversification should be encouraged as an opportunity. We would like to see the Council here taking the opportunity to encourage rural economy diversification beyond economic and social development, and also integrate environmental enhancement and protection into a diversification system. For example, integrating trees and woods into farming systems, as a way of diversification, can provide a range of benefits such as helping to absorb water and air pollution, prevent soil erosion and flooding, boost soil sustainability through support of microorganisms and addition of nutrients. They help with shelter for livestock, crop pollination, integrated pest management and product diversification. Therefore, WTS believes that trees should be part of a sustainable land management system and would like to see the LDP seeking to encourage tree planting in the rural environment.</p> <p>Built and natural heritage – we do not agree that 'landscape and biodiversity designations and opportunities must continue to be explored to capitalise on these assets in the interest of tourism and economic development.' Capitalising on natural assets goes beyond economic and social development; there is also an environmental aspect to this. Part of investing in natural capital should also be seen as enhancing and protecting the environment. The wording as written at the moment for this aim suggests that the</p> |
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| | <p>environmental aspect is not part of natural capital investment. Capitalising on these assets by protecting and enhancing them will benefit the natural environment, which in turn will benefit society through the “environmental services” that these ecosystems provide, such as flood prevention, healthy soils, carbon sinks and future sequestration, water and air quality, and renewable and sustainable resources. (199)</p> <p>Sustainability and climate change – We agree with the provisions listed here. In Annex 3, in relation to policy PMD1 Sustainability it is suggested that the Council considers the integration of the Land Use Strategy with the planning system; this should also be listed in this section to ensure that there are connections between this aim and the suggested change to policy PMD1. (199)</p> <p>We agree with the position of Scottish Borders Council (SBC) that LDP 2 must incorporate a generous supply of housing land for a range of users (MIR,3.3). We would encourage SBC to allocate within LDP 2 sites that are effective or with a high probability of becoming effective in the short to medium term. Sites granted permission in principle, such as AGREE009, should be prioritised for inclusion in LDP 2 to the exclusion of other sites that have been acknowledged as having no development interest. We also concur with the aim of SBC to promote development of brownfield sites. This aim aligns with Scottish Planning Policy, which stipulates that planning should direct the right development to the right place. Integral to this concept is the re-use and re-development of brownfield land before development takes place on greenfield sites. (219)</p> <p>At page 20, the MIR sets out that LDP2 must incorporate a generous supply of housing land, but it acknowledges that there has been a limited annual completion rate for mainstream housing and limited take up of allocated housing sites. This illustrates some of the endemic housing market failure issues with in the Scottish Borders and further underlines why sites such as Tweedbank, which clearly will have high abnormal costs to enable development, are likely to remain undeveloped and will not drive the sales values to deliver commercially viable development, high quality public realm and necessary environmental mitigation. (222)</p> <p>Support the aims, but it is another level of bureaucracy and cost for limited, if any, benefit. (241)</p> <p>In principle, yes. "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." The "Alternative Option: Eckford" which proposes 10 houses on site AECKF002 is very unlikely to fit this aim for various reasons. (244)</p> <p>Yes I agree with the main aims of the MIR: Growing our economy, planning for housing, dealing with changes to our town centres, improving communication within our rural communities, preserving our built</p> |
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| | <p>and natural heritage, promoting sustainability and climate change. They are all very worthy aspirations with which no-one could disagree - it's how these aims are achieved that I take issue with. (261)</p> <p>The gap sites should be built on before any large development are considered. (275)</p> <p>The presentational approach of LDP2 within the MIR is much improved over the previous LDP although that in itself makes comparison difficult. I note particular reference to the following: 2.21 "The SESPlan confirms the success of the Borders Railway has provided an impetus to drive new development, regeneration, tourism and business opportunities into the heartlands of the Scottish Borders." 2.21 "the dualling of the A1 and local improvements to the A68 and A7 are being promoted to improve journey times" The MIR and Planning for housing specifically do not appear to target using the benefits of these major investments and improvements . 3.3 "It is not anticipated the LDP2 will require a significant number of new housing sites" Whilst a 'significant number ' is not defined the proposals include the use of Longer Term sites. Why should Longer Term sites be included given that a 'significant number ' is not anticipated. I also note in particular items referring to "the vicinity of Peebles": (277)</p> <p>Broadly agree. The forecast population 2017 to 2026 shows little change in total and therefore minimal requirement for house building, however there is a significant forecast shift in the age profile particularly in the over 75 age range and therefore feel that the plan should specifically address this shift. This could be through the development of independent living complexes where residents have individual accommodation but share some form of common facilities, laundry, entertainment and catering along with 24 hrs staffing support but are able to live independently if appropriate. Also feel that the protection of green spaces should be given a higher priority and would take this further with a commitment to increased planting particularly of native woodland. In respect of town centres there is recognition that shopping habits are changing as a result of the internet but this is a crucial period and the LDP needs to have some specific coverage of options and plans. I feel that this should include the potential development of residential accommodation close to existing town centres to create a population that can use the shops and associated establishments. This could also be supported by the shift away from out of town retail expansion and the LDP should seek to limit this to existing sites rather than develop new. (289)</p> <p>I agree with the aims of LDP2 in that the Scottish Borders must adapt to changes in the financial environment and needs to identify and focus on what the area has to offer and how these aims are best allocated with the whole borders area. I agree that there is an ongoing need for new and replacement housing but towns like Peebles do not have the infrastructure for any further development. The areas, in my opinion, that need financial and economic support are large towns like Galashiels and Hawick and smaller communities like Innerleithen and Walkerburn who have limited job prospects and need economic and</p> |
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| | <p>social regeneration following the closure of Mills and other heavy industry. (292)</p> <p>As far as the Built and Natural Heritage aim is concerned I would suggest that this is not so much an aim, more a continuation of business as usual. An aim, in anyone's language, must seek to take us from where we are now to some better place, or a better position. To be part of a development plan this aim should therefore seek to develop, ie advance, the protection and enhancement of our rich built and natural heritage. There is one certain way in which to do this which has not yet been tried for the Scottish Borders. Designation of part of the local authority area as a National Park would achieve this and provide much-needed sustainable economic development on a scale beyond the reach of any of the other initiatives on the table at present (with the exception of the extension of the Borders railway to Carlisle which instead would complement a Borders National Park, as well as vice versa), very worthwhile as those other initiatives are. While National Park designation is not in the gift of the Council, it is something which the Council can promote and support, at no additional cost to its own budget. On Sustainability and Climate Change, I would point out that Scottish Borders Council has a duty to reflect UK Government policy in its development plan, where it refers to reserved matters. Energy is a matter reserved to the UK Government. In the House of Commons recently our MP John Lamont noted concerns over the number of large wind farms in the Scottish Borders, before seeking an assurance that 'industrial' onshore wind would not be promoted by the UK Government over other forms of renewable energy which have less impact on local communities. During Questions to the Secretary of State for Business, Energy and Industrial Strategy, Mr Lamont said: "I very much support renewable energy but many of my constituents in the Scottish Borders feel we have our fair share of onshore wind." "So can the Minister assure me that nothing in Government policy will promote onshore wind farm development over other forms of renewable energy?" In response, Minister for Clean Energy, Claire Perry MP responded: "That is exactly the point of technology neutrality," referring to the UK Government policy that as many forms of renewable energy as possible should be allowed to bid for Government support to avoid supporting one type of energy over another. It is suggested that the Sustainability and Climate Change aim should make reference to the UK Government's policy of technology neutrality, in terms which show that SBC is not favouring one type of energy over another. (152)</p> <p>We are broadly supportive of the aims as described in the LDP2 MIR. We would suggest that the section on "Rural Environment" could be better phrased "Rural Development" especially given that in this context it is about digital connectivity and business diversification to support the rural economy. SLE would also like to see the second bullet point under 3.8 "Growing Economy" refer to being flexible enough to promote appropriate economic development opportunities outwith the railway corridor as well. For example, agriculture, forestry or tourism businesses may be far removed from the railway but should not be restricted from growth because of the overarching strategy will only promote development opportunities within that corridor. (195)</p> |
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| | <p>I agree with the main aim of the LDP2, though I believe a stronger focus should be given to high speed connectivity as this is the way of the future. No connectivity = no growth. (295)</p> <p>Galashiels and Melrose get priority over other areas and the Borders should be thought of as a whole. (297)</p> <p>The Selkirk CC acknowledges the adopted Strategic Plan in which Edinburgh provides the central focus for the overarching plan area. However, the CC has previously submitted its concerns regarding this document and regrets that the Scottish Borders (and parts of Fife) are seemingly disadvantaged as a result of this 'strategy'. With regard to this Consultation for the MIR, the Community Council notes and agrees that this report should endeavour to identify and meet the economic, environmental and changing demographic challenges which currently face the Scottish Borders. In this context therefore, the Community Council seeks reassurance that the policy outlined in the proposed document will endorse the need for</p> <ul style="list-style-type: none"> • a future Selkirk By-pass to improve connectivity and that • inclusion of a potential rail extension south could provide both regional and national benefits. <p>These elements of a future central spatial strategy now need to be established as strategic policies with their alignments investigated and confirmed. This will then facilitate suitable planning policies to help achieve the longer term aims of the wider Development Plan and the next Local Development Plan (LDP2). It is suggested that other objectives contained in the future Plan should include</p> <ul style="list-style-type: none"> • A way to resolve the continuing difficulties related to derelict/ brown field sites which lie in private ownership – it is suggested that Compulsory Purchase Powers should be used ideally via Government assistance in negotiated low interest or zero loans • A72 road corridor requires radical improvement to assist development growth and associated communication links • Pursuance of a 'Dark Sky' initiative for the Borders. (305) <p>There are other parts of the Borders where development should and could be located, closer to the transport hubs which can carry commuters to Edinburgh. The role of the Council should be to ensure that the transport hubs are effective and that the public transport that services them is also effective. (318)</p> <p>Transport Scotland (TS) has no significant concerns with the spatial strategy options and the potential for any cumulative impact on the strategic road network. The LDP does not appear to be allocating a significant amount of new development, although we understand the specific numbers are not yet available due to the delay in the publication of the SESplan SDP. TS note the proposal to de-allocate 95 units. (70)</p> <p>TS note the MIR states on page 17, paragraph 2.21 that "<i>local improvements to the A68 and A7 are being promoted to improve journey times</i>". The Borders Transport Corridor STAG based appraisal is ongoing and</p> |
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| | <p>includes options at this stage for safety measures and capacity enhancements on the A7 and A68 trunk roads and for the A1 dualling to be extended. These options will be taken forward and fully appraised in the Strategic Transport projects Review being undertaken by Transport Scotland. Any outcomes should be reflected within the plan and not pre-empted, however we understand the outcomes of the STPR review may not be available while the LDP is progressing towards Proposed Plan. Close working with Transport Scotland is therefore recommended and TS will endeavour to assist where possible. (70)</p> <p>TS will continue to engage as this appraisal progresses and with the Borderlands Initiative and the Edinburgh and Lothians City Regional Deal. (70)</p> <p>TS welcome the MIR stating there is a need to reduce travel and extend and improve green network opportunities and links. Sustainable, active travel options should be an integral part of an LDP, as well as, encouraging better connectivity. (70)</p> |
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QUESTION 2

Do you agree with the preferred option to retain the existing 'Strategic High Amenity' site categorisation and amalgamate the remaining categories? Do you agree with any of the alternative options including to retain the current policy position? Or do you have another alternative option?

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| Main Issue | Sub Issue | Summary of Main Issues Raised |
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| Growing your economy: Question 2 | Agree | The contributor agrees that this would seem a logical step and would simplify the system. The critical purpose of these sites must be in the creation of employment and inward investment to the region. (24) |
| Growing your economy: Question 2 | Agree alternative option 2 | The Community Council of the Royal Burgh of Peebles and District agree with the retention of the various designations of sites. The CC does not believe however that there should be some flexibility allowed to ensure that we can maximise the potential to develop sites for employment use. This does mean that there has to be stringent rules and/or guidance in this regard and that Planning Officers will need to be robust in their interpretation of those rules. (318) |
| Growing your economy: Question 2 | Agree with alternative option 1 | The contributor supports Alternative Option 1 but notes that care would have to be taken to ensure that one use did not adversely affect an existing use. (214, 288, 315) |
| Growing your economy: Question 2 | Agree with alternative option 2 | The contributor supports Alternative Option 2. (289) |
| Growing your economy: Question 2 | Agree with alternative option 3 | The contributor does not consider the argument for changing policy has been strongly made. (209) |
| Growing your economy: Question 2 | Agree with alternative option 3 | The contributor supports Alternative Option 3 with the retention of the current policy position, with no change to the employment land hierarchy and categorisation. (274, 276) |
| Growing your economy: Question 2 | Agree with preferred option | The contributor agrees although it is unclear which option he agrees with. (25) |
| Growing your economy: Question 2 | Agree with preferred option | Welcome and support the MIR's recognition that there is a need for more flexibility within Policy ED1 sites to allow scope for a wider range of site options to be considered. This approach should be carried through to the Proposed Plan. (56) |
| Growing your economy: Question 2 | Agree with preferred option | The contributor agrees with the preferred option to retain the existing Strategic High Amenity categorisation and amalgamate the remaining categories. (171, 230, 262, 263, 273, 290, 292, 294, 299) |
| Growing your | Agree with | Scottish Land and Estates are of the view that the preferred option represents the most flexible alternative |

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| economy: Question 2 | preferred option | to the existing set up and therefore support this option if the current set up is to change. The contributors particularly welcome that for both the proposed use classes, other high quality complimentary commercial activity may be acceptable as well as non-industrial business / employment generating uses if they enhance the quality of the business park as an employment location. It is considered this is a sensible and pragmatic step. (195) |
| Growing your economy: Question 2 | Agree with preferred option | The contributor agrees with the preferred option. The current four categories are difficult to differentiate and proving difficult to enforce at present. Businesses come and then develop and move on and successor occupants of specific premises may have different business vision and objectives. (206) |
| Growing your economy: Question 2 | Agree with preferred option | Crailing, Eckford and Nisbet Community Council agrees with the preferred option providing that the definition of 'high quality' business uses is robust for the first category, and the rationale/criteria for considering other complimentary commercial activity to be included in this, is carefully balanced. The Community Council notes an absence of reference and discussion as to how SBC will attract high quality business & investment to these up-rated sites? (312) |
| Growing your economy: Question 2 | Agree with preferred option and alternative option 2 | The contributor believes that it is vital to attract businesses to the Borders, rather than seeing an outflow of revenue/wealth north up to Edinburgh. As such, the contributor thinks it correct to identify "High Amenity Business" locations for Class 4 uses. It is also important to encourage industrial and storage distribution uses, albeit the latter provides fewer employment opportunities. Each major settlement in the Borders should have the potential to attract business and growth. Clearly, it is sensible for these to be focused in and around the infrastructure, including Tweedbank. Where possible these should be on brownfield rather than Greenfield sites. The contributor also considers option 2 to be sensible. (216) |
| Growing your economy: Question 2 | Agree with preferred option or alternative option 3 | The contributor agrees with the Preferred Option or retaining the status quo (Alternative Option 3). (277) |
| Growing your economy: Question 2 | Alternative option proposed | The contributor notes that it is welcomed that the Council recognise the need for flexibility within their areas traditionally zoned for use classes 4, 5 & 6. However, the contributor questions why this flexibility cannot be implemented with the existing categories remaining in place. With the preferred option, there is flexibility offered, but at the same time, the proposal appears restrictive for those Strategic High Amenity sites, focusing on Use Class 4 primarily. The contributor therefore proposes an alternative whereby the existing categories of business and industrial sites are maintained, but there is flexibility built in where the proposed uses are complimentary to the surrounding area. (321) |
| Growing your economy: Question 2 | Background / Agree with alternative option 1 or 3 | In respect of paras 4.8 and 4.15 in the MIR - in some instances where employment is required in a rural environment such as Greenlaw and to mitigate unnecessary commuting to a 'Strategic High Amenity' area the preference would be to retain the current policy position or the Alternative Option 1 which seems to allow a more diverse group of business type classes to sit side by side in an industrial site, recognising that |

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| | | any site within Greenlaw would not extend to a large business park. (215) |
| Growing your economy: Question 2 | Disagrees with preferred and alternative options | The contributor does not agree with the preferred or alternative options. (95) |
| Growing your economy: Question 2 | Background | 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. (73) |
| Growing your economy: Question 2 | Main Issues/ General/Aims | <p>The Eyemouth Harbour Trust (EHT) and Neart na Gaoithe Offshore Ind Ltd (NnGOWL) consider that the MIR fails to address the needs of emerging industries and the associated economic growth and development opportunities, for example the opportunities for coastal locations such as Eyemouth, associated with the emerging offshore renewables industry. (109, 110)</p> <p>The EHT recommends the inclusion of a new paragraph within the MIR sub-section (para 4.12 - 4.15), covering the promotion of economic development opportunities at ports, harbours and other coastal locations. In relation to the offshore renewables-related opportunities at Eyemouth Harbour, that paragraph should include the following sentence: “...Land at and surrounding Eyemouth Harbour should be promoted for a mix of employment generating uses, including complementary ancillary uses such as the approved helicopter access facility, which promote the potential role of Eyemouth Harbour in supporting the offshore renewables industry...”.</p> <p>Whilst reserving a position in respect of the identification of a preferred option, the contributors support the need for flexibility within allocations relating to strategically important economic development areas (such as the Gunsgreen allocation near Eyemouth Harbour), particularly in relation to some forms of sui generis uses and/or uses complementary to wider Class 4/5/6 development. By contrast, the adoption of a sequential approach would not necessarily encourage complementary uses and could result in overly restrictive allocations which do not meet industry requirements. For example, recently approved helicopter access facility significantly complements Eyemouth’s wider offering as a potential O&M base for an offshore wind farm. It is unclear how such a new policy approach (i.e. including the sequential element) could facilitate such a sui generis use without an element of flexibility afforded by the policy designation and associated development brief. (109, 110)</p> <p>In paragraphs 3.2 and 3.5 of the MIR, there is no reference to significance of the Scottish Borders coastal economy. Indeed reference to the rural environment/rural economy can be found throughout the MIR, while reference to the coastal economy are absent, as is any reference to Eyemouth Harbour as a location of</p> |

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| | | local and regional significance to a range of industries, potentially including the offshore renewables sector. (110) |
| Growing your economy: Question 2 | General | The safeguarding of business and industrial land should continue to be a priority for the LDP. It is vital that the LDP2 provides a healthy supply of readily available land for business and industrial use. (7) |
| Growing your economy: Question 2 | General | 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. It is suggested that the preferred option for policy ED1 does not provide clear and robust guidance for future development on business/industrial sites, and could give cause to confusion for both applicants and the decision makers. Perhaps further consideration should be given to the wording of this policy. (7) |
| Growing your economy: Question 2 | General | The contributor considers that building on farm land will deter future farming. (27) |
| Growing your economy: Question 2 | General | Classes 4, 5 and 6 may involve 'bad neighbour' activities which are liable to generate noise, pollution, and heavy goods vehicle movements. They may also adversely affect income from tourism. These should only be permitted where they will not cause a nuisance to others, and where they are very close to trunk roads. This category should include such activities as high-volume battery egg production which seem closer to industrial activities than farming. (96) |
| Growing your economy: Question 2 | General | Contributor agrees that industrial and business allocations should be safeguarded but objects to any amendments that prevent the support for mixed-use developments that incorporate both business (Class 4 Uses etc) and housing within the same site. Also disagree that a sequential test should be required. (111) |
| Growing your economy: Question 2 | General | SEPA have no comments to make in respect of the question specifically, however highlight that the preferred option must be cognisant of associated land use policy and guidance such as SBC Flood Risk policy and the SEPA Flood Risk and Land Use Vulnerability Guidance . The potential supporting uses to the high quality business uses outlined in the MIR such as childcare facilities may not be suitable in areas which have a level of flood risk compatible for commercial premises but not for most vulnerable uses. SEPA are happy to discuss specific sites in more detail in order to set out clear information with regards to potential supportive uses on site in order to provide clarity and certainty with regards to what we would accept on such sites. (119) |
| Growing your economy: Question 2 | General | The contributor questions if there is a requirement for these sites as there seems to be empty business premises as it is. (151) |
| Growing your economy: Question 2 | General | The plan should recognise the contribution which SMEs in the construction sector can make to the economy and to housing completions. The contributor has included a document entitled 'Small house builders and developers: Current challenges to growth' by the NHBC Foundation. (156) |

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| Growing your economy: Question 2 | General | The Southern Uplands Partnership suggest that maximum flexibility would be beneficial. (196) |
| Growing your economy: Question 2 | General | The contributor considers that there seems to be a big master plan for the borders in general and notes that after all the investment in the railway line the bits around the railway will be better utilised. (203) |
| Growing your economy: Question 2 | General | The contributor believes quite simply that sites which have historically been used for industry should be retained as such, and new out of town sites developed where a top up is necessary. The contributor considers we have gone too far down the road of assuming every bit of spare ground can be used for housing development and this imbalance needs to be urgently addressed, otherwise our towns will become places to sleep and nothing else. (222) |
| Growing your economy: Question 2 | General | The contributor requires clarification on the first sentence. (231) |
| Growing your economy: Question 2 | General | The contributor does not think the urbanisation of Eshiels can be described as high amenity. The proposals for Eshiels appear to lead to a ribbon development linking Peebles to Cardrona. (23) |
| Growing your economy: Question 2 | General | The contributor would like to see more imagination used e.g. develop a brand new town in the Borders perhaps along the lines of Poundbury near Dorchester rather than tinkering with difficult bits of land in existing communities. (256) |
| Growing your economy: Question 2 | General | The contributor states that while in an ideal world, scenic areas could be preserved against all-comer, it is Neanderthal in outlook to allow that to inhibit necessary development, which can be temporary and reversible, to dictate sterility of action. SBC should lead and not be spectators of the success of others. (258) |
| Growing your economy: Question 2 | General | The contributor is of the view that the policy largely focuses on the railway and Tweedbank, and therefore commenting by the inherent use of the railway. It would be good to see the strategy make business links between the towns and also schools and higher education to make the best use of business ideas from within the borders. The plan also focuses on industrial areas, it isn't clear where these should be, what is clear is that there should be a requirement to produce a business plan for any proposal outwith a specific area. (260) |
| Growing your economy: Question 2 | General | The contributor notes that as well as sustainability, development should focus on the well-being economy so that local people are fit, healthy and able to work. (272) |
| Growing your economy: Question 2 | General | The contributor believes that sites should be available to all use categories (with the possible exception of Class 1). This would allow the development of ancillary business around Class 4 users. A prime example of this is Cavalry Park in Peebles, which lay undeveloped for many years but is now home to many thriving |

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| | | businesses. (283) |
| Growing your economy: Question 2 | General | The contributor is of the view that Newcastleton should be included as a rural development area. (287) |
| Growing your economy: Question 2 | General | Strategic High Amenity business requires high speed broadband connectivity, meaning gigabit and beyond, not 24 mbps. (295) |
| Growing your economy: Question 2 | General | The contributor considers that the whole of the Borders should be included. (297) |
| Growing your economy: Question 2 | General | Selkirk and District Community Council agree in principle although there are concerns about introducing a retail element into the options. Also, the potential involvement of leisure/hotel developments need careful consideration. (305) |

QUESTION 3

Do you think there are any settlements in which new or more business and industrial land should be allocated, and if so where?

QUESTION 3

Do you think there are any settlements in which new or more business and industrial land should be allocated, and if so where?

| Main Issue | Sub Issue | Summary of Main Issues Raised |
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| Growing your economy: Question 3 | General | The main justification for the expenditure on the Borders Railway was the development of Galashiels, Tweedbank and other settlements along the route. However the main thrust of the new proposals for commercial development appears to be around Peebles and district. The contributors appreciate that people want to come to live in Peebles and developers certainly want to develop in Peebles rather than Galashiels. However the contributors contend that the Local Authority has a duty to direct development to where the infrastructure can support further growth i.e. Galashiels, Tweedbank, Hawick and Jedburgh. (23, 185, 229, 252, 261, 276) |
| Growing your economy: Question 3 | General | From the contributor's experience, there would appear to be a need for low cost business units in Galashiels. The availability of cheap serviced land with good access to roads is limited. (23) |
| Growing your economy: Question 3 | General | Strategically placed in the areas with the highest unemployment and deprivation. (25) |
| Growing your economy: Question 3 | General | Contributor disagrees. When you take away farming, what is left? We will have to import and with uncertainty related to Brexit, where will that lead us? (27) |
| Growing your economy: Question 3 | General | A site should be identified adjacent to the railway (within the Galashiels/Tweedbank/Melrose area) where a retirement village for the ageing population could be established. This would also offer a significant economic and employment opportunity. As such it should be targeted to an area where more employment opportunities are required. (90) |
| Growing your economy: Question 3 | General | The contributor does not agree that there are any settlements in which new or more business and industrial land should be allocated. (175) |
| Growing your economy: Question 3 | General | There are many towns and settlements within the SBC area which are in need of regeneration and redevelopment - for example parts of Hawick, Galashiels and Walkerburn where there are redundant buildings which could be redeveloped before they deteriorate to an extent that they should be demolished. There appear to be brownfield sites which should be earmarked for development before greenfield sites are used. As a result of the obvious success of the Borders railway, the rail corridor should be an absolute priority for mutually supportive industrial, commercial and residential development. (166) |
| Growing your economy: | General | The contributors do not believe there are any settlements in which new or more business and industrial land should be allocated. (179, 181, 192) |

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| Question 3 | | |
| Growing your economy: Question 3 | General | The contributors consider that there are enough areas which industry and businesses could use without building new. (189, 276) |
| Growing your economy: Question 3 | General | It would help to know if the mooted extension of the railway is likely to happen as planning could then really be fit for the 21 st century and allow forward thinking. (197) |
| Growing your economy: Question 3 | General | The contributor notes that the investment in the railway line should be utilised and where there is more infrastructure capacity. (203) |
| Growing your economy: Question 3 | General | In the event of a disastrous Brexit the pressures for repurposing current agricultural land may force change to the policies on business development / land allocation in rural areas. (206) |
| Growing your economy: Question 3 | General | Scottish Natural Heritage (SNH) would be happy to provide advice on natural heritage opportunities and constraints in new allocations if any are proposed by other stakeholders. (213) |
| Growing your economy: Question 3 | General | The contributor is unsure if all existing brownfield sites have been fully examined for possible development- could this be looked at again? Has there been any analysis of what businesses would be best placed in the Borders? Unless there is more information as to what businesses could be attracted and what size it is difficult to comment on their location. Do we have any projections of business need? The idea that a child care nursery might be sited within a business area to suit employees has limited value - comments such as that would indicate there has been limited research in the development of such a proposal. Families want childcare where they live and connect to - no one lives in a business park after working hours. (243) |
| Growing your economy: Question 3 | General | The contributor is of the view that it would make sense to focus on areas within walking / cycling distance of the train line followed by a focus on areas according to unemployment in those areas. (277) |
| Growing your economy: Question 3 | General | The contributor considers there is plenty of unused space already in the Borders. (281) |
| Growing your economy: Question 3 | General | The contributor is of the view that if there are opportunities to develop new business, of a size and scale to suit, in farms and rural communities that are outwith the zoned industrial land this should be encouraged with the aim of bringing or securing employment in rural areas. (315) |
| Growing your economy: Question 3 | General – Innerleithen | The contributor suggests looking for business land on the southern half of Traquair Road in the vicinity of the cemetery and Data Store facility, Innerleithen. (206) |

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| Growing your economy: Question 3 | General – A7/ A68/ Tweeddale | Development should be focused on the A7 and A68 rather than taxing a transport network that is already creaking at the seams in the Peebles area. (239, 241) |
| Growing your economy: Question 3 | General – Bonchester Bridge, Denholm, Jedburgh | The contributor suggests Bonchester Bridge, Denholm and Jedburgh. (230) |
| Growing your economy: Question 3 | General – Central Borders/ Reston/ Eddleston/ Walkerburn | <ul style="list-style-type: none"> • Far greater emphasis should be made for industrial/business development around the new railway corridor. SBC needs to be really proactive at promoting this area. This really is where investment should be concentrated. Massive amounts of public money have been injected in the railway which seems to be acting as a new lifeline to Edinburgh. It is SBC's responsibility to capitalise on this investment by promoting commercial enterprises along this corridor; (155, 186, 188, 197, 207, 239, 241) • There is also a need for SBC to be far more proactive in promoting business and housing in the Reston area. If this is going to be promoted as a station on the East Coast route, people need houses to live in, and the area could become attractive for industry. Currently there are just 5 houses (AREST005) suggested at Reston; this is far too few. (155, 206) • There is a need to allocate business and industrial land in the Eddleston and Walkerburn areas too. Eddleston is close to Edinburgh but has good connection to Peebles and is on the bus route. Walkerburn is in vital need of investment and is not that far from Peebles which is desperately short of business development opportunities. (155, 206) |
| Growing your economy: Question 3 | General – Central Borders/ Reston/ Walkerburn/ Innerleithen | The contributors consider that land should be allocated around the railway in the Central Borders and near the proposed railway station at Reston (150, 172, 276) . Also, at Walkerburn. (150, 172) and Innerleithen. (292) |
| Growing your economy: Question 3 | General – Galashiels | The contributor suggests using the former yard (assuming Burgh Yard). (229) |
| Growing your economy: Question 3 | General - Greenlaw | As mentioned previously by the contributor regarding prospective developers of the Greenlaw Town Hall and the potential for them wanting to locate a small ceramics workshop and retail outlet in the village then industrial land would be required for this - possibly the current proposals for industrial land will be enough, but consideration could be given to utilising other areas of land with different planning designations. Note here there are several areas of land with potential to become housing although the completion rate of |

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| | | these areas of land indicates that an alternative use may encourage more constructive growth in the village. (215) |
| Growing your economy: Question 3 | General - Hawick | There is a great need for new/more business and industrial land in Hawick. (190, 290, 297) |
| Growing your economy: Question 3 | General – Hawick | There are still several brownfield sites which have not been utilised in Hawick, namely zEL49, zEL62, zEL50, zEL60, zEL48 and MHAWI001 (from the existing Local Development Plan) many of which can be classified as derelict or vacant at present. (212) |
| Growing your economy: Question 3 | General – Innerleithen and Walkerburn | The contributor states that business and industrial land should be aligned to the need for investment and economic growth rather than somewhat randomly allocated. In the Tweeddale area there is a need for small business and LBG investment in Innerleithen and Walkerburn rather than stretching the already fragile infrastructure in Peebles to the point where it is detrimental to local business. (239) |
| Growing your economy: Question 3 | General – Peebles | Peebles would be an ideal location to locate spin-off service businesses serving the major population centres in Mid Lothian. (222) |
| Growing your economy: Question 3 | General – Peebles | Contributor 236 states that there needs to be a Cavalry Park 2 though not necessarily conterminous. A site needs to be identified and the capital investment made by Council / Enterprise in purchase and site servicing and serviced plots sold to recover investment. It is 25 years since the bold decision was made on Cavalry Park. Contributor 283 states that they see no allocation of an addition business site is Peebles or Western Tweeddale as a whole. This is an absolute must otherwise the town will suffer further from the "commuter" factor - which cannot be good in terms of sustainability. (236, 283) |
| Growing your economy: Question 3 | General – Peebles | The contributor considers that the old factory on March Street, Peebles should be allocated for job creation. (247) |
| Growing your economy: Question 3 | General – Peebles Area | Contributor 273 is of the view that the Peebles area already has capacity with Cavalry Park and the town centre. Contributor 285 states that Peebles should certainly not have any new or more business and industrial land. (273, 285) |
| Growing your economy: | General – Railway | There should be a focus on the areas in and around Galashiels or along the route of the new railway. The vast majority of people who will be housed in new development projects will likely be forced to work |

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| Question 3 | Corridor | outside the area, most likely in Edinburgh, so maximum use should be made of the new railway service between Edinburgh and Tweedbank. (201, 229) |
| Growing your economy: Question 3 | General - Selkirk | There are many brownfield sites within our towns such as Selkirk with excess industrial land that could be allocated. (221, 289) |
| Growing your economy: Question 3 | General – Selkirk | The contributor considers that the bypass is the key in Selkirk. (258) |
| Growing your economy: Question 3 | General – Selkirk | <p>Selkirk and District Community Council suggests there is sufficient short-term capacity within its area, especially if derelict and brownfield sites are able to be ‘unlocked’ and properly developed. However, the approval of a defined line for a by-pass would provide additional (future) capacity with a unique opportunity for both residential and employment growth.</p> <p>Derelict and brownfield sites should provide redevelopment opportunities but there are clear dangers in privately owned land being left to visually decay and blight the local community. This stultifies growth and undermines the positive benefits of recent regeneration projects and investment into Selkirk (and other regeneration areas in the Borders)</p> <p>Current blighted sites include:</p> <ul style="list-style-type: none"> • former St Mary’s Church site adjacent to A7 (suggest a design brief be prepared which retains the long outward view from the Market Place – as a community preference) • former Baptist church site (the Valley) • former Burgh School site - Chapel Street • former fish farm site (Philiphaugh Mill) - suggest a detailed brief be prepared • residual buildings/ sites (former Mill premises) in the Riverside area. (305) |
| Growing your economy: Question 3 | General – Tweedbank | The contributor considers that many of our industrial estates, especially Tweedbank, are beautifully landscaped but could easily accommodate small clusters of small scale well designed studios with/without accommodation – all using existing infrastructure which is nowhere near running at full capacity. This might even encourage more people to do a weekly/weekdays commute out of Edinburgh. (137) |
| Growing your economy: Question 3 | General – Tweedbank/ Galashiels/ Stow | The Council's approach to supporting economic development along the Borders Railway corridor and in the settlements of Tweedbank and Galashiels in particular are welcomed by Network Rail. Not only is this the location of the densest population within the Council area, but the location to which the spatial strategy directs future growth. The improved rail connectivity provides opportunities for a range of employment uses, and measures to capitalise on this via tools such as the Simplified Planning Zone at Tweedbank and Masterplans at Galashiels and Tweedbank are supported. Whilst Network Rail recognise that existing sites are identified and available at Galashiels and Tweedbank, and this will form part of the remit of the |

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| | | Masterplans for both settlements, consideration could be made towards further at Galashiels and Stow to make the most of beneficial opportunities for the use of the Borders Railway and public transport towards the end of the plan period. (294) |
| Growing your economy: Question 3 | General - Walkerburn | The contributors state that new business and industrial land should be located in towns and communities where employment is low following the demise of traditional Border industries such as the woollen trade. An example of this is Walkerburn. (185, 223) |
| Growing your economy: Question 3 | General – West Linton | The contributor considers that new business and industrial land should be identified given that the potential site – BWEST003 in the MIR is no longer available. In addition it is considered that allocated site zEL18 should be enforced. There is a long waiting list of businesses waiting for premises but nothing is available. (214) |
| Growing your economy: Question 3 | General & Newtown St Boswells BNEWT002 (Land North West of the Holmes Barns) | The contributor considers that there are further opportunities for business and industrial land and considers the subject site in Newtown St. Boswells to be one of them. (136) |

QUESTION 4

Do you have any suggestions for a potential area of land to be allocated in the vicinity of Town Yetholm, Lauder and Kelso for business use, and if so where?

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| Main Issue | Sub Issue | Summary of Main Issues Raised |
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| Growing your economy: Question 4 | Background/ General - Lauder | The contributor states that paragraph 4.7 of the MIR refers to “a broad area of search to the west of the settlement” in reference to allocating land for business use in Lauder. At present the potential area encompassed by this broad area of search is not explicitly set out. The contributor’s comments are therefore general and based on natural heritage assets that they are aware of in the general area west of Lauder. The Lauder Burn forms part of the River Tweed Special Area of Conservation (SAC). The broad area of search should be included in the Habitats Regulations Appraisal of the LDP and an appropriate caveat should be included for all allocations in this area to ensure that project level Habitats Regulations Appraisal is carried out if required. (213) |
| Growing your economy: Question 4 | General | Contributor does not suggest any sites as there are no transport links in these areas. These areas are used for farming. (27) |
| Growing your economy: Question 4 | General | The contributor notes that you cannot just build business units without having a vision of what you want to put there. If you have lots of desperate businesses, you won’t attract the ancillary services. As it is logistically difficult to manufacture there you would be better off trying to attract either small manufacturing, electronics and AI for example or some sort of services businesses. (203) |
| Growing your economy: Question 4 | General | Scottish Natural Heritage (SNH) would advise that any allocation is informed by relevant environmental assessment and that once a preferred site is identified that a design led approach is adopted to the necessary site layout issues, sustainable transport and landscape design/placemaking issues. SNH would be happy to provide further advice on these matters when more detail on location(s) is available. (213) |
| Growing your economy: Question 4 | General | The contributor is of the view that it would make sense to allocate land for business use in areas already containing businesses. (232) |
| Growing your economy: Question 4 | General | The contributor believes that it should be looked at more sensibly and sensitively and that it should include local people more effectively. (297) |
| Growing your economy: Question 4 | Kelso | The contributors advise that any additional land for business use would be best located south of Kelso adjoining the industrial estate at Pinnaclehill Park. (174, 288, 289) |
| Growing your economy: | Kelso/ Town Yetholm | The contributor states that in the case of Town Yetholm, natural heritage assets include the River Tweed SAC and the Cheviot Foothills Special Landscape Area. The Pennine Way and St Cuthbert’s Way long |

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| Question 4 | | distance footpaths are also present to the east of the settlement. There are a number of designations around Kelso, including the River Tweed SAC and the Tweed Lowlands Special Landscape Area. The MIR does not set out where in Kelso or Town Yetholm that land may be allocated. (213) |
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QUESTION 5

Have you any suggestions as to how allocated business and industrial land can be delivered more effectively?

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| Main Issue | Sub Issue | Summary of Main Issues Raised |
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| Growing your economy: Question 5 | Background/ General | Scottish Land and Estates (SLE) note that there are already significant actions being taken to support delivery of more business and industrial development as highlighted from paragraphs 4.1 to 4.11 of the MIR. SLE particularly welcomes recognition of the need to enable farm diversification and that more weight should be given to economic development benefits within planning policy for new businesses, leisure and tourism developments in the countryside. SLE consider the use of SPZs as a means of establishing more sites for delivery should be encouraged and SLE hold similar expectations that the Borderlands Initiative and the South of Scotland Enterprise will help to unlock commercial development land which can often be held up by infrastructure restrictions, particularly in rural areas. It is SLE's view that the proposal for policy ED1 will provide greater flexibility which may assist in bringing forward more sites for business and industrial use. SLE considers that there could be a more sophisticated approach to developer contributions protocol upfront. By setting out clear policies which incentivise business/industrial development upfront greater certainty is provided for everyone involved in the process, resulting in an increased likelihood of sites coming forward. As an organisation, SLE supports greater collaborative working between public and private sectors to pool resources and deliver sites. Partners could pool land holdings, take shares in accordance with their share of land, borrow to finance the necessary infrastructure, and sell the land back to the shareholding members in pre-agreed proportions and locations at a value that would also take account of remaining obligations to be placed on developers. This would enable the funding debt to be repaid but leave landowners with incentives to carry out development in the plan. This approach shares development and financial risks for local authorities and landowners while helping to secure funding for infrastructure. SLE would like to see greater priority given to mixed-use development in housing allocations, for example, where one or two appropriate commercial units can be included as part of a wider housing development. This would help deliver much needed land for commercial use and amenity within new housing developments. (195) |
| Growing your economy: Question 5 | Galashiels | SBC is currently marketing the former yard in the centre of Galashiels at £1m. Why not clean up this polluted site and offer it for commercial use? (23) |
| Growing your economy: Question 5 | General | Creating/promoting attractive environments with access to facilities (such as being able to get something to eat at lunch/break times, and somewhere to relax during these times). (24) |
| Growing your economy: Question 5 | General | The contributor suggests reducing rates in high streets to encourage more businesses to take up units. (147) |

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| Growing your economy: Question 5 | General | The contributor would welcome requests from potential businesses. Land should be allocated appropriately if there are suitable sites depending upon demand. (151) |
| Growing your economy: Question 5 | General | The contributor suggests cooperation between the Council, the proposed South of Scotland economic development agency, site owners, developers and potential investors. (166) |
| Growing your economy: Question 5 | General | The contributor suggests that units are prebuilt to make it easier for small businesses to move into (168) |
| Growing your economy: Question 5 | General | The contributor notes that if there is land adjacent to current usage e.g. industrial estates, or areas which are specialist in nature e.g. the craft cottages at Abbotsford - then surely that should be investigated. Tourism sites could host a small number of related industries or retail outlets in relevant places which could be beneficial to the attraction and minimise the visual downsides of industrial parks dotting the countryside whilst answering the need for economic development. Much of the land designated for industrial (and housing) development is agricultural. Is there scope for additional economic opportunities allied to existing farming development? (197) |
| Growing your economy: Question 5 | General | Compulsory purchase – but this would need to be initiated by a relevant Economic Development body such as South of Scotland Enterprise who would then need to access Council compulsory purchase powers. (206) |
| Growing your economy: Question 5 | General | Scottish Natural Heritage (SNH) highlight that the delivery of sites is complex and many aspects are outwith their remit. SHN would however suggest that focussing effort and site design for business and industrial land on the unique natural assets of the Scottish Borders should be seen as part of the solution for effective delivery. Building brand identity and reflecting local sense of place, views and landscape character in well-designed business sites can speed up effective delivery for example. SNH are aware of various projects or initiatives that could feed into this thinking, including colour strategies for business / industrial buildings to both give projects unique identity and competitive advantage but also to reflect local landscape character. (213) |
| Growing your economy: Question 5 | General | The contributor believes the Council must monitor requests for existing land effectively to ensure these are not being protected for other uses. (214) |
| Growing your economy: Question 5 | General | The contributor notes that it is one thing allocating business and industrial land. However, if the development of this land is not viable, then SBC / Scottish Enterprise Borders / Business Gateway Scottish Borders need to intervene / assist. Developers and investors will only commit capital where they can see a sensible economic return. Subsidies, rental guarantees and grants should be considered in the usual way. (216) |
| Growing your | General | The contributor states “don’t build houses everywhere”. (222) |

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| economy: Question 5 | | |
| Growing your economy: Question 5 | General | The contributor notes with support from the Scottish Government. (230) |
| Growing your economy: Question 5 | General | The contributor requires clarification on the use of the word 'delivered'. (231) |
| Growing your economy: Question 5 | General | The Planning Bill has identified that the planning implementation on black and green infrastructure needs to be improved and that is a real challenge given the current set up. Sites for employment as opposed to mixed use needs to be backed up by resources and skills to address market failure. Planning as a facilitator. (236) |
| Growing your economy: Question 5 | General | The contributor suggests better local engagement. While the contributor really appreciates that the planning office are trying, and are stretched for resource, local advertising campaigns (fliers in supermarkets and local shops) and speaking to communities (churches, youth leaders, community leaders) is more likely to deliver suggestions of land that is supported by the community. (239) |
| Growing your economy: Question 5 | General | Industrial units should be on the edge of towns away from houses. (241) |
| Growing your economy: Question 5 | General | The contributor states that the Local Development Planning process should take into account the intention to create a Rural Economic Framework to mainstream rural development within the National Performance Framework, based on the recommendations of the National Council of Rural Advisors. (https://www.gov.scot/publications/new-blueprint-scotlands-rural-economy-recommendations-scottish-ministers/). To achieve realistic growth in the rural economy may require a more sympathetic planning regime which can accommodate the digital and infrastructure needs and allow development including housing to happen, which is presently restricted by planning policy. (242) |
| Growing your economy: Question 5 | General | Where planning is granted for a change of use from a business class to residential there should be a requirement for further business land to be allocated for potential development otherwise more and more work will move out of the Borders. (277) |
| Growing your economy: Question 5 | General | The contributor believes the Council should consult with potential users. (280) |
| Growing your economy: Question 5 | General | The contributor recommends that the Use Class restriction is reduced. (283) |
| Growing your | General | The contributor advises that the process should be as simple and straightforward as possible. (288) |

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| economy: Question 5 | | |
| Growing your economy: Question 5 | General | The contributor believes that the Strategic Development Plan is the correct vehicle, over time. (290) |
| Growing your economy: Question 5 | General | The contributor believes that allowing redundant industrial sites for housing should be stopped. (292) |
| Growing your economy: Question 5 | General | With the proliferation of online business delivering goods and services, high quality and cost effective warehousing would seem a logical asset to acquire. Communications across the Borders are good with access to airports, road and rail links. Warehousing is required and land is at a premium further south. (295) |
| Growing your economy: Question 5 | General | Local knowledge and local business directories should be utilised more effectively alongside more consultation with the populations. (297) |
| Growing your economy: Question 5 | General | Infrastructure is paramount to encourage business development. Fast broadband for rural areas, good roads connecting to Edinburgh, Newcastle and Carlisle combined with a skilled workforce, reasonable rents and rates will encourage start-up companies and encourage inward investment. (315) |
| Growing your economy: Question 5 | General | Planning Officers must ensure that when sites are allocated in the LDP2 that they are given their proper designation to preserve and enhance land that is currently occupied and available for employment use. (318) |
| Growing your economy: Question 5 | General - Hawick | The contributor considers that brownfield sites should be a priority for business and industrial development (251) . Rejuvenating many of the derelict buildings in Hawick should be made a priority, to improve the appearance and attractiveness of Hawick for both locals and tourists. Business and industrial land should not be situated at the town entrance as it reduces the town's attractiveness, and Hawick at present is working very hard to improve its attractiveness to visitors to increase tourism. This is something which is distinctly lacking in Hawick at present. Particularly in Hawick, there is a need to develop vacant and derelict land to enhance the attractiveness of Hawick centre, where the A7 runs through. Care should be taken to prevent historic sites from being affected. (212) |
| Growing your economy: Question 5 | General – Galashiels/ Hawick | An improved road and rail network within the Central Borders would help attract businesses to the parts of the region in need (e.g. Galashiels, Hawick). (261) |
| Growing your economy: Question 5 | General – Galashiels/ Selkirk/ Hawick | The contributor considers that the industrial areas of Galashiels, Selkirk and Hawick should be expanded. (27) |

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| Growing your economy: Question 5 | General – Selkirk | The Selkirk and District Community Council state that with regard to Selkirk, the establishment of an A7 by-pass route to the south east of the town would define an area for future town expansion and would allow both residential and employment opportunities. This would benefit both the town and Central Borders and help provide a wider environmental choice for growth and improved communication/access. (305) |
| Growing your economy: Question 5 | General – Hawick | The contributor considers that old and historic buildings should be used for business in Hawick and that there should be a greater focus on Hawick. (190) |

QUESTION 6

Do you agree with the preferred options for the provision of additional business and industrial land/ mixed use land in the LDP2? Do you agree with the alternative option for mixed use land? Or do you have other alternative options?

QUESTION 6

Do you agree with the preferred options for the provision of additional business and industrial land/ mixed use land in the LDP2? Do you agree with the alternative option for mixed use land? Or do you have other alternative options?

| Main Issue | Sub Issue | Summary of Main Issues Raised |
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| Growing your economy: Question 6 | Agree with preferred option | The contributor agrees with the preferred options for the provision of additional business and industrial land/mixed use land in the LDP2. (171, 263, 274, 312) |
| Growing your economy: Question 6 | Agree | The contributor agrees although it is unclear which option they agree with. (25) |
| Growing your economy: Question 6 | Disagree | The contributor disagrees although it is unclear which option he/she disagrees with. Highlights that farming is important in this area. (27) |
| Growing your economy: Question 6 | Disagree with preferred and alternative options | The contributor does not agree with the preferred or alternative options and suggests no alternative options. (95) |
| Growing your economy: Question 6 | MDUNS005, South of Earlsmeadow, Phase 1, Duns | <p>SEPA state that there appears to be a marshy area in the northern corner of the site which may be drained to culverts under the site. Any such culverts should be removed as part of any development. Confirmation should be made that this is not a Groundwater Dependant Terrestrial Ecosystem. It is therefore recommended that a site requirement is attached requiring a feasibility study including a flood risk assessment to be undertaken prior to development to assess the potential for channel restoration.</p> <p>SEPA require an FRA which assesses the risk from the potentially culverted small watercourse which is identified as being located along the northern boundary. Recent studies have not identified the exact location of the culvert. We do not support development over culverts that are to remain active. We would note that the OS Map identifies this area as boggy which may constrain development. We also understand that land-raising done as part of the high school development may alter flooding and flow-paths. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues at this site or immediately adjacent. This should be investigated further and it is recommended that contact is made with the flood prevention officer.</p> <p>SEPA advise that there is a potential surface water hazard.</p> |

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| | | Foul water must connect to the existing Scottish Water foul network however for a development of this scale it is likely that the foul network and STW will require upgrading. Scottish Water should confirm this. Depending on the use of the proposed units there may be a requirement for permissions to be sought for certain activities from SEPA. (119) |
| Growing your economy: Question 6 | MDUNS005, South of Earlsmeadow, Phase 1, Duns | The contributor states that the site is far too big a suggested development. (197) |
| Growing your economy: Question 6 | Eddleston | There is a need to allocate business and industrial land in the Eddleston and Walkerburn areas too. Eddleston is close to Edinburgh but good connection to Peebles and is on the bus route. (155) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I | The contributor confirms part ownership of (MESHI001) and supports the inclusion within the MIR. (21) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I | The contributor supports the inclusion of this site. (283) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I & MESHI002, Land at Eshiels II | The contributor makes reference to a separate representation made (91) which covers their objection concerns to the sites MESHI001 and MESHI002. All the points raised in submission (91) are covered below. (112) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I & MESHI002, Land at Eshiels II | <p>The contributor has submitted a separate representation on behalf of many members of the Eshiels Community who object to the preferred allocations (MESHI001 and MESHI002). These concerns are already included within this table, within the issues outlined below. These concerns include, lack of sewage, infrastructure, roads infrastructure and archaeological constraints.</p> <p>They raise landscape impact concerns, given the location in the Tweed Valley Special Landscape Area. Furthermore, landowner/developer willingness to progress with development within those significant sites does not appear to have begun meaningfully. The reliance on such a large allocation at Eshiels to deliver housing within the LDP timeframe when minimal investigation into deliverability and viability has been carried out would seem a risky strategy.</p> <p>The importance of landowner and developer willingness to engage in taking sites forward for development is being acknowledged with allocations for 95 units in the current LDP being proposed for removal by the</p> |

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| | | Council. The designation of large sites as 'preferred', when landowner/developer willingness is unknown may be regarded as premature. (317) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <p><u>General:</u></p> <p>The contributor objects to the inclusion of (MESHI001) within the MIR. (189)</p> <p>The contributor states that the population density of the Eshiels development alone has 30% households per hectare. (276)</p> <p>Advises that 240 houses will swamp the existing community, linking Peebles to Cardrona, with a major loss of good quality agricultural land and jobs essential to the economy. (20)</p> <p>The contributor highlights that the supporting document makes reference to a sawmill at Eshiels, which has not existed for over 20 years. (150)</p> <p>There are inconsistencies between the proposals and existing SBC policies. (166)</p> <p>The contributor states that SBC should not try to concentrate so many new developments around Peebles. Instead it should be trying to grow the economy around the train corridor leading to Galashiels. (188)</p> <p>The contributor raises concerns that the three fields are in the middle of nowhere and were selected totally at random for no rhyme nor reason. (201)</p> <p>The contributor states that there are people out there who really care about the area. This is their past and their future, and this is something they are willing to fight for. (249)</p> <p>The contributor states that the suggestion of a mixed use conurbation in Eshiels is absurd. (276)</p> <p>The contributor states that instead of this site, new hamlets can be created or the land can be better used, with smaller expansion in more areas. (205)</p> |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <p><u>Deliverability of the site:</u></p> <p>The contributor notes that given the major infrastructure investment required, this has the potential to affect deliverability of the site. Sewerage capacity continues to be a major factor in site deliverability in the Borders generally, it is considered to be premature to allocate such a large site without knowledge or capacity issues. Notes that a fundamental aspect of site deliverability is landowner and developer</p> |

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| | | willingness and sites should only be allocated where there is such willingness to engage in taking forward the development process. There are no assurances regarding the deliverability within LDP2 timeframe as very little background research has been done, including establishing landowner willingness, as noted above and drainage/water supply capacities. (91) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <u>Commuter area:</u> Concerns raised that the area will become a commuter area, to the detriment of those who already live there. The contributor states that if Edinburgh has a problem with the lack of affordable housing, it must address those needs itself rather than export the issue to other areas. (108) Contributor raises concerns that residents would need to use their cars to access shops and services. They will just keep going to Edinburgh even in leisure time and not spend money in Peebles or contribute to the community. (141) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <u>Location:</u> The contributor states that the location is not suitable for a public transport provision or 'active travel' perspective. Existing provision is unsatisfactory based even on current demand at Eshiels. (91) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <u>Coalescence:</u> The contributor states that in the event that both (MESHI001 and MESHI002) are developed, there would be significant coalescence of development in this location on the north side of the River Tweed with consequent detrimental impact upon the SLA. (91) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <u>Surrounding views/key receptors/setting:</u> The contributors object to the inclusion of (MESHI001), including some of the following concerns; impact upon the surrounding views, peace and tranquility of the area. (31, 33, 34, 37, 43, 64, 76, 83, 98, 140) The contributor raises concerns regarding the impact of the development upon the tranquillity of Peebles and the surrounding countryside. (205) Contributor objects to the inclusion of the site. As a local resident who moved from Edinburgh to live in a rural setting which is famous throughout the world, object to houses or communities to be built on their doorstep. (97) Contributor states that the area between Eshiels and Cardrona is exceptionally beautiful. (167) |

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| | | <p>The contributor raises concerns that the views from tourist cottage(s) will change drastically and objects to the development. (49, 96)</p> <p>Contributor raises concerns regarding the impact upon the views/landscape/scenery. (50, 52,53, 149, 202, 239, 243, 320, 233)</p> <p>The development would result in the loss of existing views from many of the current houses in Eshiels. (90)</p> <p>The contributor states that there would be an unacceptable landscape impact from key receptors along the A72 given the openness and topography of the site. (91)</p> <p>The development will have a huge impact on the scenic character of this beautiful part of the Tweed valley and approach to Glentress, identified as being a major tourist attraction. The creation of a separate development will blight the landscape for tourists, walkers and mountain bikers. (46)</p> <p>The contributor states that the cycle path allows access to the beautiful green area between Peebles and Cardrona and it should be retained. (249)</p> <p>The contributor states that the rural development plan talks of the importance of the open and sweeping scenic vistas. (276)</p> <p>The contributor states that people enjoy the ‘wilderness’ experience and this must be valued. (243)</p> <p>The contributor raises concerns that the development will destroy their views from the garden and the approach to Glentress Forest and surrounding hills. (227)</p> <p>Contributor raises concerns regarding the visual impact of the development. (197)</p> |
| <p>Growing your economy: Question 6</p> | <p>MESHI001, Land at Eshiels I, Eshiels</p> | <p><u>Scale of the development/character of the area/SLA:</u></p> <p>The contributor states that the scale of the proposed development will blight the lives of the current Eshiels community. (46, 69)</p> <p>Contributor raises concerns regarding the number of houses suggested. They note that other rural sites within the plan have much lower densities. They suggest that a development of around 20 houses within Eshiels would be more appropriate. (300)</p> |

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| | <p>The contributor highlights that Eshiels is not an existing settlement within the LDP and that housing/industrial premises would swamp Eshiels. (139)</p> <p>The contributor states that the development would have a negative impact upon the Tweed Valley. (188)</p> <p>The contributor states that having a huge development at the entrance to Peebles will take away from the appeal of Peebles. (186)</p> <p>The contributor raises concerns regarding the unique organic character and development pattern of Eshiels. Housing co-exists with small scale rural and agricultural enterprise, which makes it a very hospitable place where people enjoy living and working. Previous new buildings have been carefully integrated into the landscape and the existing settlement pattern, retained within the original field boundaries. (139)</p> <p>The contributor objects to the development of this site, raising concerns regarding the scale of the proposed development, as well as the location and the impact of which, will be too great upon the surrounding area. (51)</p> <p>The contributor states that the development would be out of scale/character for the area. (90, 98, 140, 142, 150, 158, 166, 178, 179, 180, 185, 188, 186, 194, 198, 201, 241, 268, 269, 276, 298, 207)</p> <p>The contributor states that the development would severely detract from the current atmosphere and attractiveness of the area. (149)</p> <p>The proposal for the two Eshiels sites exceeds the number of houses/businesses for the whole of the rest of the Borders and are completely out of proportion. The site is unwelcome urbanisation. (172)</p> <p>The site is out of character and contrary to Policy PMD4 and LDP2MIR para 3.6. (172, 185, 186, 198, 207, 216)</p> <p>The contributor states that the site is out of proportion. (216)</p> <p>The contributor states that the site is too compact for the proposed development and the scheme shows characteristic indications of overdevelopment. The layout and form is different from other dwellings in the immediate vicinity. Raises concerns that the proposed layout and design features are not informed by any analysis of what should fit respectfully within the local scene and with other sites in the area, merely by site restraints. Development proposals must demonstrate that they, and ancillary activities associated with</p> |
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| | <p>them, will respect and enhance the character of the site, its context and surroundings in terms of its architectural approach. This poor design does not reflect this. (98)</p> <p>The contributor states that the development would destroy the character of the area. This would be an unwelcome urbanisation of the countryside which will contribute to destroying the uniqueness of the Scottish Borders countryside. (52)</p> <p>The contributor states that the scale of the development is incongruous with the existing settlement, the landscape setting and the SLA, resulting in a loss of openness, with detrimental impact upon the local landscape character. The contributor highlights that the site is very prominent in the landscape setting and specifically on the approaches to and from Peebles. The area is exposed and its development will have a material detrimental impact upon the setting of Eshiels and will appear incongruous within the wider landscape. It is not considered that development of the scale proposed at this location would be based upon a clear understanding of the context or the 'sense of place' of the existing settlement at Eshiels. (91)</p> <p>The contributor states that the site is located within the heart of the Tweed Valley SLA where management recommendation include taking great care with development on settlement edges. Development of either or both of the Eshiels sites would materially and detrimentally impact upon the SLA and the features for which the designation exists and may have a materially detrimental impact upon tourism. (91)</p> <p>The contributor states that Eshiels is a designated SLA and additional development as proposed will result in the urbanisation of an, essentially rural area. (166)</p> <p>The contributor raised concerns regarding the impact upon the Special Landscape Area. (172, 178, 179, 185, 186, 239, 207, 216)</p> <p>The contributor raises concerns that the site is within the Tweed Valley SLA and is therefore due to special protection from insensitive development such as those proposed. It is not of an appropriate scale, will have a major landscape impact, and will prejudice the character of the area. The proposed developments are not appropriate and counter to existing policies. It represents unwelcomed urbanisation of the countryside which will contribute to destroying the uniqueness of the Scottish Borders countryside and biodiversity. (155)</p> <p>The contributor states that the location of business or industrial land in close proximity to the A72 is likely to have a greater detrimental impact upon the landscape setting than housing of appropriate density, with any landscaping taking many years to mature as has been the case, and continues to be the case, at</p> |
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| | <p>Cardrona. (91)</p> <p>The contributor states that this development would produce a highly visible development, visible from the road, and just as visible as the over development of the Kittlegairy estate. An almost continuous development along this road would be the result, spoiling the view for residents and visitors alike, and having an adverse effect on the whole valley. (108)</p> <p>The contributor states that the development would result in the loss of landscape characteristics evident within the Borders landscapes, including hardwood planting and shelter belts, as well as agricultural land. The Council should perhaps look at Eshiels and use it as a model for placemaking in other parts of the Borders. (139)</p> <p>The contributor objects to further proposals for more urban development in the Tweed Valley around Glentress. One of the great attractions of Glentress as a destination is that it feels like it is out in the country and the approach has an attractive ambience. (154)</p> <p>The contributor states that 240 units is wrong for a number of reasons in an area where there are currently only around 20 houses. (155)</p> <p>The contributor considers that the proposed development would result in the area becoming urbanised. (271)</p> <p>The contributor states that the intensity of development of housing and business premises on the two Eshiels sites is excessive and equates to more than is proposed for the 'preferred' sites in the remainder of the SBC area. (166)</p> <p>The contributor states that any developments should be appropriate to the immediate environment and therefore be only on a small scale (eg) small groups or individual properties in keeping with the surroundings. (201)</p> <p>The contributor states that making Eshiels a much bigger satellite of Peebles will destroy the countryside feel of the Western Borders. (223)</p> <p>The contributor states that they are a regular visitor to Glentress as a keen mountain biker and these proposals would badly effect the surrounding area. (266)</p> <p>The contributor raises concerns that Eshiels is a small settlement located in the beautiful Tweed Valley</p> |
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| | <p>with stunning views. There has been a settlement in the Eshiels area for well over 200 years. The current settlement is made up of mainly single housing ranging in age from Victorian to modern day. (292)</p> <p>The contributor states that the current approach to Glentress forest is in keeping with the surrounding countryside that attracts people to the area. Developing this area for housing will severely detract from its current atmosphere and attractiveness. (292)</p> <p>The contributor states that, if the development was implemented, it would transform the area from a rural environment to a more urban one potentially reducing the quality of life for the existing residents. (293)</p> <p>The contributor states that the development site is in a Special Landscape Area and development on the proposed scale would make a mockery of this designation. (298)</p> <p>The contributor raises concerns at the loss of the countryside. (268)</p> <p>The contributor raises concerns regarding the density and scale of the proposed development, stating that if it is anything like Cardrona, the number of houses will treble as is happening there. (257)</p> <p>The contributor states that the proposed development seems at odds with the landscape/out of proportion. (239, 243)</p> <p>The contributor states that the urbanisation would be most unwelcome in this rural economy. (216)</p> <p>The contributor states that locating a big mixed use site so close to Glentress is crazy, it will detract from the wild natural beauty which is part of the attraction of the Seven Stanes Leisure Facility (into which millions is being poured). They state that an alternative would be to locate more business/industrial units why not use March Street Mills. (217)</p> <p>The contributor states that the area is of great beauty and this type of development would be out of scale to the existing settlement. (229)</p> <p>The contributor states that development of the proposed magnitude would ruin the approach to Glentress and Peebles. Peebles will be ruined and it will be just another struggling town. The uniqueness of Peebles and the surrounding countryside should not be spoilt for the sake of the greed of the developers. (233)</p> <p>The contributor raises concerns regarding the over development in the vicinity of Eshiels. (206)</p> |
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| | | <p>The contributor states that it is too big a development in a badly chosen location. The proposed mixed use sites would detract from the approach to Glentress and Peebles from the east, one of the delights of the eastern entrance are the open spaces, fields, woodland etc on the north side of the road. (197)</p> <p>The contributor raises concerns regarding the number of units proposed, which would swamp the existing hamlet and cause logistical problems. (197)</p> <p>The contributor raises concerns regarding the impact upon the special scenic area, impact upon the character of the area and visual damage to the landscape. (197)</p> <p>Current policy EP5 helps to protect against inappropriate development in the Special Landscape Area. These proposals are inappropriate and should be rejected. (318)</p> <p>The contributor does not consider that the siting of industrial buildings alongside housing is appropriate. (149)</p> |
| <p>Growing your economy: Question 6</p> | <p>MESHI001, Land at Eshiels I, Eshiels</p> | <p><u>Tourism:</u></p> <p>The contributor objects to the inclusion of (MESHI001) and the potential impact upon tourism. (37, 40, 48, 49, 50, 51, 53, 64, 83, 98, 140, 141, 142, 149, 178, 179, 186, 197, 202, 239, 241, 243, 257, 266, 268, 269, 300, 320, 271, 209, 227, 229, 233, 235)</p> <p>The contributor states that the area will become less attractive to walkers and cyclists. (188)</p> <p>The contributor raises concerns that such a development will make Glentress less appealing if it is surrounded by housing and business estate. (186)</p> <p>The contributor states that these areas of natural beauty are becoming less and less now and they are sure that the Scottish Tourist Board must have also made their concerns heard. (76)</p> <p>The contributor states the development of this site would have a detrimental effect on tourism and people's enjoyment of the Tweed Valley. (52, 69, 90, 139, 188)</p> <p>The contributor raises concerns that Glentress has an international reputation as a centre of excellence for mountain biking. (139)</p> <p>Whilst there may be benefits of having additional tenants in the area, the area is one of beauty where the contributor visits regularly and tourism is extremely important for the area. Mountain biking and outdoor</p> |

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| | <p>pursuits in Glentress are a year round activity, generating income for the area. Building more houses would really take detriment and adversely affect tourism. (32)</p> <p>The contributor states that Glentress mountain biking is celebrated all over Britain for its spectacular biking in the heart of the Tweed Valley. Having a huge development would have a negative effect on families, mountain bikers and hikers visiting the area. (51)</p> <p>The contributor objects to the inclusion of the site, as any such development would be incompatible with the existence of the Tweed Valley Forest Park and the declared intention to developer tourism at Glentress, in the town of Peebles and in the Tweed Valley generally. (59)</p> <p>The proposal for these two sites will detract from the tourist potential of the area and hence its economic development by blighting the visual approach to Glentress and the views from within the forest outwards. Glentress is a highly successful tourist destination, for walkers and mountain bikers, also people visiting the immediate area. Tourists will be put off the area if it is part of an urban sprawl. There is an increasing number of other mountain biking areas with which Glentress is competing and the proposed development will only make it a less attractive option amongst these. (90)</p> <p>Further proposed development, particularly on the scale suggested for the Eshiels area near the entrance to Glentress, feels like further urbanisation of this beautiful location which will hugely detract from its attraction as a destination for visitors. (154)</p> <p>The contributor raises concerns that the development will remove a sense of countryside experience which will impact negatively on tourism. (155)</p> <p>The contributor states that the proposed uses are inconsistent with and are potentially damaging to the type and nature of tourism development taking place at Glentress and the expectations of the visitors who are and will be attracted to it. (166)</p> <p>The contributor states that the area provides a range of recreational activities; mountain biking, horse riding, golf, walking, cycling and fishing. The suggested development will destroy much of the attraction of this area and undermine ongoing investment in the recreational facilities. (167)</p> <p>The contributor states that Glentress is used for walking, running and camping. The proposed dwellings will have a substantially negative impact on the attractiveness of Glentress as a tourist destination, and being able to deliver a positive experience for customers. (185)</p> |
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| | <p>The contributor states that Eshiels is an area of natural beauty which attracts a huge number of visitors, particularly to Glentress. They raise concerns that the proposed large scale development would spoil the visitor experience to the area. (201)</p> <p>The contributor raises concerns regarding the impact of the development upon Glentress for biking. The development would take away the peacefulness. (205)</p> <p>The contributor raises concerns that development on this site would ruin the countryside of the area including Glentress which is one of the areas key tourism hotspots. (246)</p> <p>The contributor states that the urbanisation, apart from biodiversity impact, will change the experience for 300,000 visitors to Glentress alone never mind the other mountain bike trails. (276)</p> <p>The contributor states that Eshiels is the gateway to Glentress forest which is part of the world famous 7stanes bike parks which attracts over 300,000 visitors to the area annually. (292)</p> <p>The contributor raised concerns regarding the impact upon Glentress/Tweed Valley. (268, 269, 257, 271, 300)</p> <p>The contributor raises concerns that development on this scale and in this area would form a visual corridor which would have a significant impact on the landscape value for tourism, right next to one of the Scottish Borders biggest tourist attractions, Glentress Forest. (239)</p> <p>The contributor states that the development would have a detrimental economic impact on the Glentress area which is the main tourist destination (e.g) mountain biking, walking, Go Ape. This is counter to Policy ED7. (207)</p> <p>The contributor states that the development would have a massive hit on the economic development of the Glentress area as a draw for walking and mountain biking tourists. (216)</p> <p>The contributor states that any development in the immediate area of Glentress should be tourist related, rather than aimed at small businesses which should be located on brownfield sites. (216)</p> <p>The contributor states that these sites are in the open countryside and major development in this area will detract from the quality that the visitors value so much from visits to the Scottish Borders. (30)</p> <p>The contributor raises concerns that the site would be adjacent to the Forest Holidays development within</p> |
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| | | <p>Glentress, the proposal would blanket that area with development. (206)</p> <p>The contributor states the impact on the surrounding recreational area of Glentress and surrounding countryside on outdoor activities will be adversely affected. This appears to be counter to Policy ED7. (198)</p> <p>Glentress Forest is one of the principal tourist attractions in this part of the Borders and has attracted considerable investment for leisure facilities including a holiday complex, outdoor tree activities as well as developing as a significant mountain biking centre. Any major development in this location begins to urbanise the countryside and detracts from what tourists and visitors are seeking, peace and tranquillity. Given that Peebles is becoming increasingly dependent upon tourists for its long term survival, any development that hinders its progress in this regard has to be challenged. (318)</p> |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <p><u>Land economics:</u></p> <p>Contributor raised concerns at the inclusion of (MESHI001), in respect of land economics. (24)</p> |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <p><u>Traffic:</u></p> <p>The contributor raises concerns regarding the impact upon traffic and the A72/surrounding road networks/parking/potential for accidents. (20, 52, 69, 90, 108, 139, 141, 142, 145, 149, 155, 158, 166, 167, 172, 185, 186, 197, 198, 201, 202, 239, 241, 243, 269, 271, 276, 292, 293, 300, 207, 216, 229)</p> <p>Concerns that the development will create a lot of extra traffic as people will inevitable drive to Peebles for various services. (46)</p> <p>Concerns are raised that if business units were to be located at Eshiels this could increase the likelihood of large vehicles/lorries in the vicinity. (202)</p> <p>The contributor states that the proposal is neither rural or urban, as it is within the school catchment distance and yet the pupils have no bus available but have to walk along the side of an increasingly busy A72. The alternative is for parents to transport them to school by car, across the bridge thereby increasing further congestion in Peebles. (271)</p> <p>The contributor states that the development will result in a considerable increase in traffic, as every house will have a minimum of 2 cars, every business will have at least 2 cars. The town could not cope with all the extra traffic. (235)</p> |

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| | | <p>The location is sufficiently remote from the town and its facilities that it will be inevitable that a development of the type proposed will have a significant impact upon road traffic. Given the need to use cars more to access shops, where will these extra cars park? Peebles is already running short of adequate parking facilities; there are very few, if any, sites that could be used for car parking. (318)</p> <p>The contributor states that increasing the settlement along the A72 risks an increase in the number of accidents, in particular cyclists coming off the hill routes quickly, straight onto the A72. (108)</p> |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <p><u>Noise and air quality:</u></p> <p>The contributor raises concerns regarding noise and air quality, as a result of the development. (20)</p> |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <p><u>Infrastructure/services:</u></p> <p>The contributors raise a number of concerns regarding the existing infrastructure and services/amenities in and around Peebles. These concerns include the capacity of existing; schools, roads (including parking), sewerage treatment, utility infrastructure and health centres which are already stretched and the requirement for an additional bridge over the River Tweed. More houses in Eshiels or Peebles should not be considered until these facilities are improved first. (20, 23, 69, 141, 145, 155, 166)</p> <p>This is an area of outstanding natural beauty and does not have the infrastructure or facilities to support such a large development. If housing is required then land should be sought with better transport links to local amenities. (38)</p> <p>Contributors raised issues regarding school transport and the distance school children will have to travel to school means that pupils do not qualify for a school bus. (46, 155, 172, 186, 198, 205, 207, 216, 239, 269)</p> <p>Raised concerns regarding the current infrastructure provision (this includes reference to schools, health centres, roads, parking, fire/police/ambulance services, water, electricity, gas, and sewerage facilities). (53, 59, 83, 90, 139, 149, 179, 180, 194, 197, 201, 205, 252, 257, 292, 300, 209, 217, 229, 235)</p> <p>The contributor states that there would need to be local infrastructure improvements if the developments at Eshiels were to go ahead, including; road lay-out on the A72, new sewerage provision and new water pumping station to get the water up the hill. The developers should be responsible for funding these. (155)</p> <p>The contributor objects to the inclusion of the site and states that the site is not considered to be capable</p> |

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| | <p>of being delivered within the LDP lifespan due to the significant infrastructure constraints which have not been sufficiently researched to date. These include; landowner willingness, sewerage capacity, water treatment capacity, archaeological constraints and roads infrastructure requirements. Other significant material infrastructure constraints include school capacities and healthcare facilities. (91)</p> <p>The contributor states that the existing access is not suitable. Major investment would be required to create a new 'through route' access within the sites and new junctions with the A72. The viability of the investment requirement is unknown, which could realistically affect deliverability. There is no direct and sustainable off-road link to Peebles. The walkway/cycleway is located to the south of the recycling centre with the nearest connection points onto the route being at some distance from the site and requiring crossing of the busy A72. Without a new safe off-site route to Peebles which is constructed to directly connect with the site, there would be an increased number of pedestrians which would have to use the existing pavements adjacent to the busy and fast road, this putting more pedestrian traffic at risk. Furthermore, as the site is over 3 miles away from the High School, children would not be entitled to a school bus pass. (91)</p> <p>Concerns are raised that the development will result in an increase in the population, which will put pressure on the existing infrastructure and services residents would require, including schools, doctors and social services. (108)</p> <p>Concerns are raised that future road expansion will take place along the old railway tracks, which are currently used for walking/cycling. (108)</p> <p>The contributor raises concerns regarding suitable footpaths between Eshiels and Peebles. Highlighting that there is currently a badly maintained narrow footpath. The old railway cycle path does not link Eshiels and Peebles directly. (139)</p> <p>The contributor raises concerns regarding the lack of a safe footpath between Eshiels and Peebles. (239)</p> <p>The contributor states that the majority of home owners within the new proposed dwellings will be commuters and this will have a substantial impact on the quality of the roads between Eshiels and Edinburgh, as well as increasing car miles. (185)</p> <p>There needs to be significant investment in Peebles High School before any significant expansions to the local population can be considered. The contributor raised concerns regarding the capacity of Peebles High School. (185)</p> |
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| | <p>Haylodge Health Centre is becoming more and more stretched, with growing waiting times for appointments. The contributor highlights that it would take 500 new houses to justify increasing the health centre budget to recruit 1 additional GP. The proposed dwellings would be completely irresponsible given this situation. (185)</p> <p>The contributor states that there is only 1 ambulance covering the area. (185)</p> <p>The contributor states that there will need to be massive changes to the roads, accesses, junctions etc in the immediate area of Eshiels to cope with the number of people requiring access to the A72 main road from the new development. This is already a very busy and highly dangerous road. (201)</p> <p>The contributor states that mixed use is not appropriate for the site, due to the narrow access roads. (273)</p> <p>The contributor states that commitment to extensive infrastructure improvements are required before any further significant development can take place. (269)</p> <p>The contributor raises concerns regarding the car parking facilities within Peebles and that it cannot cope with the current population. (252)</p> <p>The contributor questions the expansion in infrastructure required. They question how this proposal will link to Peebles, as it is well outside and looks like a housing scheme, stuck in a random field. The Cardrona proposals also have a similar look about them and they wonder about the need for more community infrastructure on the Cardrona site. (243)</p> <p>The proposal would encourage a large amount of school car traffic. (241)</p> <p>The contributor raised concerns regarding the infrastructure requirements and physical ability to re-route the A72, drainage and re-location of existing septic tanks. (239)</p> <p>The contributor advises that measures to support sustainable transport in the form of safe cycling and walking to Peebles, along the A72 are considered through the site requirements and in association with (MESH1002). (213)</p> <p>The contributor states that there is insufficient road and water infrastructure. (235)</p> <p>The contributor raises concerns regarding infrastructure issues, including the A72 as a result of the development. As a result, there will be slowing of moving traffic and a knock on effect of not enough</p> |
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| | | <p>parking provision in Peebles. People may travel to Straiton with the consequent negative effect to the vibrancy and economic health of Peebles. (197)</p> <p>The contributor states that Eshiels has no amenities and residents will go into Peebles and head to Edinburgh. (197)</p> <p>The contributor states that the location is not suitable for a public transport provision or ‘active travel’ perspective. Existing provision is unsatisfactory based even on current demand at Eshiels. (91)</p> |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <p><u>Ribbon development and green belt:</u></p> <p>The contributors raise concerns that development on this site would be ribbon development. (23, 139, 149, 150, 155, 172, 178, 179, 185, 186, 197, 198, 205, 241, 269, 276, 292, 207, 216, 229)</p> <p>The Borders is known for its vast and grass fields and rolling hills, by adding these houses, Peebles and Cardrona will be inadvertently forced together while simultaneously wiping away the grass fields that make the Borders so special. (180)</p> <p>The contributor states that building in Eshiels will connect the Borders corridor, with housing stretching from Peebles to Cardrona, spoiling much of the countryside and changing these areas from a peaceful small town to a disruptive large town. (205)</p> <p>The contributor states that in the event that both (MESHI001 and MESHI002) are developed, there would be significant coalescence of development in this location on the north side of the River Tweed with consequent detrimental impact upon the SLA. (91)</p> |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <p><u>Health & well being/amenity of existing residents:</u></p> <p>The contributor states that the development of (MESHI001) would impact upon the health and well being of the existing residents. (43)</p> <p>The development would have a negative effect on the amenity of the existing residents at Eshiels. These contributors include reference to; noise, light and dust pollution. (90, 95)</p> |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <p><u>Dark skies lost:</u></p> <p>The contributor states the development will result in the loss of Peebles dark sky. (51, 69, 90, 276)</p> <p>The contributors raise concerns regarding the impact of the development upon the Eshiels dark sky environment. (139, 149, 155, 186, 197, 292)</p> |

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| Growing your economy: Question 6 | MESH1001, Land at Eshiels I, Eshiels | <p><u>Loss of agricultural land:</u></p> <p>The contributor states that a great deal of agricultural land will be lost along with the rural jobs associated with the land. (69)</p> <p>The contributor states that the development would cause the destruction of ancient pastures. (108)</p> <p>The contributor states that the development would result in the loss of prime quality agricultural land. (30, 149, 166, 205, 292)</p> <p>The contributor raises concerns at the loss of good quality agricultural land and the impact on agricultural employment essential to the economy of the Scottish Borders. (155)</p> <p>The site will result in the removal of agricultural land counter to Policy ED10. (172, 185, 186, 198, 207, 216)</p> <p>Contributor raises concerns regarding the loss of green belts and agricultural land. (241)</p> |
| Growing your economy: Question 6 | MESH1001, Land at Eshiels I, Eshiels | <p><u>Loss of existing community within Eshiels:</u></p> <p>The contributor states that the proposed development would mean the existing community would be lost. (69, 186)</p> <p>The contributor fears this small rural community may be permanently scarred by this proposal. (201)</p> |
| Growing your economy: Question 6 | MESH1001, Land at Eshiels I, Eshiels | <p><u>Burn:</u></p> <p>The contributor raises concerns regarding the slippage of land adjacent to the burn which runs along the north side of the plateau fields in the valley, north of the River Tweed. The natural embankment (a significant length of where the western end of the new build is proposed), could disintegrate. (88)</p> |
| Growing your economy: Question 6 | MESH1001, Land at Eshiels I, Eshiels | <p><u>Indicative site capacity:</u></p> <p>The contributor states that the indicative site capacity for this site and (MESH1002) is greater than the 'preferred sites' for the whole of the rest of the Borders. (90)</p> |
| Growing your economy: Question 6 | MESH1001, Land at Eshiels I, | <p><u>Flood risk:</u></p> <p>The contributor states that the development would increase flooding risk for the housing and fields below</p> |

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| | Eshiels | <p>the road. (90, 235)</p> <p>The contributor states that the development may lead to flooding of areas to the south of the A72. (166)</p> <p>The contributor states that there was widespread flooding 2 years ago along the Tweed Valley, which demonstrated that the A72 is very vulnerable to flooding, for much of its length it is also at risk from erosion by the River Tweed. Putting further housing in an area where its vital routes are at risk, would be irresponsible. There are no alternative routes in the event of flooding. Building over agricultural land will prevent rainfall moving slowly through the soil, run-off will be swifter and this will exacerbate flooding. (108)</p> <p>The contributor highlights that the main road and lower field at Eshiels are subject to flooding every time there is heavy rain. The building of new roads and new paved parking areas would add to this problem. (139)</p> <p>The contributor raises concerns there will be a significantly increased flood risk for the existing houses especially as the land does not drain well at present. Furthermore, likely to be increased risk to the A72 where there are frequent flooding issues. (150)</p> <p>The contributor states that although the 2 sites are not currently in the SEPA flood risk zone this will change drastically once the agricultural land is removed contributing to faster run-off, increasing the rate at which rainwater falling on the proposed new development reaches the Tweed. SEPA would need to investigate with revised models. (155)</p> <p>The contributor raises concerns regarding flood risk as a result of development on this site/surrounding area/roads. (172, 198, 205, 269)</p> <p>The contributor states that the land adjacent to the proposed dwellings is prone to flooding, and this has often encroached onto the A72 road. With rising water tables and west weather, 26 hectares of tarmac'd land would need significant investment in drainage for the whole area. (185)</p> <p>The contributor states that significant flooding takes place most years on (MESH1001) site. Question whether the Council intend to stipulate that the houses and businesses are built on stilts. (298)</p> <p>The contributor states that the areas at the bottom of the fields act as flood plains at the moment with housing here the road and houses opposite will be subject to flooding. The road currently floods over the road when heavy rainfall. (241)</p> |
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| | | <p>The contributor raises concerns regarding the potential for flooding from the hills into the fields. (239)</p> <p>The contributor states that the development adjacent to the flood plain would increase the risk of flooding to homes/buildings/fields below the A72. (207)</p> <p>The contributor raises concerns regarding flood risk as a result of the development, for the houses and fields below the A72, due to 27 acres of developed/tarmacked land close to the floodplain. (216)</p> |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <p><u>Sewerage disposal:</u></p> <p>The contributors raise concerns regarding the main sewage system, capacity and the fact that the site is downstream of the works. (90, 139)</p> <p>The contributor states that there is no public sewer at Eshiels. The level of investment which would be required in order to service both sites is currently unknown. (91)</p> <p>Contributor raises concerns regarding the problems of sewerage disposal/treatment from the site. (172, 197, 198, 269, 293, 207, 216, 229, 235)</p> <p>The contributor advises that the proposed number of dwellings would have a detrimental impact on sewage processing at Eshiels Recycling Centre, along with the ability to process all waste from these dwellings. (185)</p> <p>Apart from some low level comment regarding WWTW and WTW, which are assumed to refer to waste water treatment and sewerage, there is little or no consideration as to how levels of waste and sewerage will be dealt with. This site is downstream of the existing sewerage facilities that serve Peebles. (318)</p> <p>Contributor raises concerns regarding septic tank waste and whether the existing treatment plant can cope with this amount of houses. (197)</p> |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <p><u>Natural heritage/archaeology:</u></p> <p>The contributor states that the development would not protect or enhance the natural heritage of the area. (90)</p> <p>The contributor raises concerns regarding the impact that developing the site will have upon archaeological interest. A Roman settlement was once situated there and there are many artifacts which remain buried. If building works is carried out many of the remains will be destroyed. (194)</p> |

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| | | <p>The contributor states that there are archaeological/heritage constraints within part of the site. Installation/upgrading of infrastructure may detrimentally impact upon these interests. (91)</p> <p>The contributor states that development may cause damage to the historic sites, buildings and artefacts close to the access road. (108)</p> <p>The contributor states that this is an historic and close knit peaceful community, with its roots in post WW1 social change and history in arboriculture. Numerous artefacts alongside the roads and tracks would be at risk. (108)</p> <p>The contributor states that the allocation has the potential for direct and setting impacts on scheduled monument SM3667 Eshiels Roman Camp. They are content with the principle of development in this area and welcome the inclusion of mitigation requirements for an adequate buffer zone to protect the physical remains and setting of Eshiels Roman Camps, a suitable management regime for the section of the monument within or adjacent to the development area, and for any infrastructure upgrades to avoid impacts on the scheduled monument. They note that a masterplan would be required for these sites, and recommend early consultation with HES on the development of any masterplan that may emerge. (164)</p> <p>The contributor raises concerns that the development will disrupt the site of archaeological interest, the Roman marching camp that is situated on both sides of the A72. (167)</p> <p>The contributor raises concerns in respect of the archaeological impact of the new infrastructure on the local scheduled monuments. (239)</p> |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <p><u>Greenhouse gas emission:</u></p> <p>The contributor advises that the development would not reduce the need to travel or greenhouse gas emissions. (90)</p> |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <p><u>Biodiversity:</u></p> <p>The contributor advises that the site presents moderate biodiversity constraints including potential impact upon the River Tweed SAC/SSSI. (91)</p> <p>The contributor states that the proposal would have a reduction of biodiversity counter to Policy EP3. (172, 207)</p> <p>Contributors raise concerns including the following; impact upon local wildlife/ecology/biodiversity/TPO's</p> |

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| | | <p>(108, 140, 167, 179, 185, 202, 239, 241, 216)</p> <p>The contributor raises concerns in respect of the environmental impact upon biodiversity. (239)</p> <p>The contributor raises concerns regarding the environmental impact from the development. (197)</p> |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <p><u>Impact upon River Tweed SAC:</u></p> <p>The contributor states that the proposal would increase the risk of pollution to the River Tweed and its tributaries. (108)</p> |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <p><u>Landscape (SNH):</u></p> <p>The contributor states that development of this site would lead to a significant change in the landscape character of the area, which is currently rural and with dispersed dwellings. They raise concerns that development has the potential to be detrimental to the landscape character and would lead to an isolated and low density development that is physically and perceptually detached from the town.</p> <p>The draft site requirements propose planting, landscaping and shelter belts will be required to provide mitigation and help integrate the site with its surroundings. At this location, they consider that such measures would change the character of this section of the Innerleithen Road, losing the sense of openness and views across this site towards Cardie Hill and Ven Law. The contributor considers that is allocating this site is required, part allocation in the northern part of the proposed site around Eshiels steading should be considered. Development would form a less dominant feature and would be within an area where existing boundary features could be strengthened to further reduce impacts.</p> <p>Recommend that tis the site is taken forward, that the placemaking aims for the site are clearly articulated in advance. They suggest that the design intentions for neighbourhood functions, the urban form, density of development and the approach to design led landscape mitigation, across this site and (MESHI002) should be clearly set out within the LDP. They advise that in order to produce a coherent approach to a new settlement pattern in this location, an integrated approach to urban form which considered views and design relationship/set back of development from the A72, will be required through a clearly communicated site development brief. (213)</p> |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <p><u>Co-location issues:</u></p> <p>The contributor highlights that there may be co-location issues, including odours, with the nearby Peebles waste water treatment works and the adjacent Eshiels recycling centre. (91)</p> |
| Growing your | MESHI001, | <u>Suggested limitations on construction works:</u> |

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| economy: Question 6 | Land at Eshiels I, Eshiels | The contributor suggests that the following limitations are put on any construction work; <ul style="list-style-type: none"> - Sound barriers put in place between their property and the proposed construction works - Acceptable type and level of noise be decided upon, monitored and enforced by Environmental Health Officers on a regular basis - Environmental Health Officers to monitor the amount of light pollution on their property - Environmental Health officers to monitor the proposed construction site to ensure that the dust and smell levels - Request that vehicle movements on the small rural road be limited to specific traffic times and restricted number of vehicles that pass by at any given time - Request restrictions on the working hours to set times of the day, as to minimise noise pollution during unsociable hours and that no construction works take place on the weekends. (95) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <u>Access to an existing property:</u> The contributor states that the proposed entry barrier/gate on the planning application will be situated directly in front of their property and it will restrict visitors, traffic and movement to their house. Therefore, the contributor requests that the barriers are altered or moved further up the road running alongside their property and/or to install separate barriers at the entrance at the individual car parks so that movement to access their house is not restricted. (95) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <u>De-value existing properties:</u> The contributor states that the proposal will devalue existing properties. (98) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <u>Design:</u> The contributor states that any development must be designed to a high standard, avoid unacceptable impacts on amenity, and demonstrate social, economic and environmental sustainability. Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. (98) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <u>Carbon foot print/sustainability:</u> The contributor states that an increase in the number of houses (and their occupants) will mean people doing more journeys to get to work, shops etc as there are no facilities close by. This is at odds with the reports stated aim to decrease the carbon footprint in the area. (108) |

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| | <p>The contributor raises concerns that the development will make each household less sustainable as more fossil-fuel miles have to be made to Peebles to shops and schools. (155)</p> <p>The contributor raises concerns regarding the additional carbon emissions, as most homeowners will be commuters. This is counter to the overall SBC objective to be more sustainable by reducing car miles. (172)</p> <p>The contributor states that with such a significant amount of housing proposed this is counter to the overall SBC objective to be more sustainable by reducing car miles, especially as most new home owners will be commuters. (186)</p> <p>The contributor raises concerns that the location of the site will mean the majority of housing if not all will be heavily reliant on private vehicles which does not make this proposal a more sustainable in accordance with LDP MIR para 2.15. (198)</p> <p>The contributor raises concerns that the focus of the LDP is targeting the wrong transport corridors and proposing a higher level of carbon emissions which is contrary to the council's objective of increased sustainability and reduced carbon road miles. (201)</p> <p>The contributor raises concerns that the development would add significantly to carbon emissions, as the majority of house owners will commute to work. This is counter to the overall SBC objective to be more sustainable by reducing car miles. (292)</p> <p>The contributor states that residents will need to drive to work in Edinburgh, adding to the traffic congestion and pollution. (252)</p> <p>The contributor states that you will be adding to the carbon footprint as it will be family housing with more commuters where car is the only available transport. (241)</p> <p>The contributor raises concerns regarding the increased carbon emissions as a result of the development. (239, 229)</p> <p>The contributor raised concerns regarding the carbon emission increase, as most house owners will be commuters. This is in the opposition to the overall SBC objective to reduce car miles and increase sustainable lifestyles/living. LDP2 MIR para 2.15. (207)</p> <p>The contributor raises concerns that the proposal contradicts the promotion of sustainable travel principles</p> |
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| | | <p>in section 5.8. Development along the A72 will encourage more private car miles, where development along the Borders railway would increase returns on the public expenditure on that public transport. (209)</p> <p>The contributor raises concerns that more cars means more carbon emissions, which is against the SBC objective to be more sustainable by reducing car miles (LDP2 MIR Para.2.15) (216)</p> <p>The contributor raises concerns regarding the extended fossil fuel pollution as a result of the development. (197)</p> <p>Concerns raised that the area will become a commuter area, to the detriment of those who already live there. The contributor states that if Edinburgh has a problem with the lack of affordable housing, it must address those needs itself rather than export the issue to other areas. (108)</p> <p>Contributor raises concerns that residents would need to use their cars to access shops and services. They will just keep going to Edinburgh even in leisure time and not spend money in Peebles or contribute to the community. (141)</p> |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <p><u>Food security:</u></p> <p>The contributor raises concerns regarding food security. The need for a secure local food supply increases, and destroying good agricultural land by building on it is unwise. Land unsuitable for food production should be the land put forward for building, it may be more expensive for the developer, but then it would be even more expensive to try to produce essential food from unsuitable land. (108)</p> |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <p><u>Woodland:</u></p> <p>The contributor has identified ancient semi natural woodland present at the north eastern boundary of the site. According to the Scottish Government's policy on woodland removal, there is a strong presumption against the removal of this type of woodland. According to SPP provisions, development which is likely to negatively impact this type of woodland should be located away from the area. Therefore they would like to see a requirement included which asks for a buffer area between the development boundary and the woodland. (199)</p> <p>They would also be able to support the requirement to protect and enhance boundary features, if the wording 'where possible' was removed. (199)</p> <p>They would like to see any additional planting on site to be specifically native tree planting with trees which have been sourced and grown within the UK. (199)</p> |
| Growing your | MESHI001, | <u>Disproportionate/alternative locations for development:</u> |

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| <p>economy: Question 6</p> | <p>Land at Eshiels I, Eshiels</p> | <p>The contributor states that the scale of the proposed mixed use site is disproportionate to the developments proposed elsewhere in the Borders. (201)</p> <p>The contributor raises concerns regarding high number of houses proposed compared to other areas and proportion of the total number for the Borders. (241)</p> <p>The contributor states that the sites are looking to deliver the largest number of houses of the whole plan, in a hamlet that is not even identified as a settlement. The proposal is disproportionate to the size of the small settlement which currently exists. (239)</p> <p>The contributor states that the number of houses/businesses suggested for the Eshiels sites on its own is greater than the 'preferred sites' for the rest of the Scottish Borders, which is shocking and totally disproportionate. (207)</p> <p>The contributor states that the number of units (240) for 2 preferred sites at Eshiels is greater than for the whole of the rest of the Borders, which is out of proportion. (216)</p> <p>The contributor states that the proposal is disproportionate to the overall requirement (3,841). (197)</p> <p>The main settlements are the areas which should be developed Borders wide, developing very small settlements such as Eshiels will cause undue pressure on an already heavily laden services system. (179)</p> <p>The contributor states that the houses proposed would be disproportionate to the total number of proposed houses planned for the whole of the Borders. (185)</p> |
| <p>Growing your economy: Question 6</p> | <p>MESHI001, Land at Eshiels I, Eshiels</p> | <p><u>Existing business/industrial sites:</u></p> <p>The contributor states that there are a number of existing business units/industrial areas in the town of Peebles that are currently not at full capacity. If business units are at Eshiels it will take business away from the High Street which already has empty premises. (202)</p> <p>The contributor states that they are unaware of any businesses or industry being carried out at Eshiels. They are therefore confused as to why this has been designated as a mixed use development site. (269)</p> <p>The contributor states the businesses based in small units (.g) Calvary Park, whilst making a contribution, are a tiny %. Peebles has in essence become a distant suburb of Edinburgh. Trying to address/improve this by suggesting mixed use development and urbanisation in Eshiels is nonsensical. (207)</p> |

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| <p>Growing your economy: Question 6</p> | <p>MESHI001, Land at Eshiels I, Eshiels</p> | <p><u>Amenity:</u></p> <p>They would lose their view and have no privacy as a result of the development. They do not feel that it would be a safe place to raise their family. They chose to live their because of it's rural, scenic and offers space for leisure. (202)</p> <p>The contributor raises concerns regarding the impact upon the amenity, including views, noise and lighting as a result of the development. (249)</p> <p>The contributor states that the volume proposed in Eshiels would be overbearing on the current properties. (276)</p> <p>The contributor raises concerns in respect of the destruction of the visual amenity. (209)</p> |
| <p>Growing your economy: Question 6</p> | <p>MESHI001, Land at Eshiels I, Eshiels</p> | <p><u>Drainage:</u></p> <p>The contributor states that drainage on the Eshiels site from this proposed development may contribute negatively to the flow of the River Tweed. (276)</p> <p>Contributor raises concerns regarding the drainage from the site. (269, 293)</p> <p>Contributor states that there is no surface water or foul water drainage facilities. The existing capacity of the Scottish Water Sewerage Treatment Works at Eshiels is already being exceeded with limited opportunity for expansion. The option for 'reed bed' treatment and disposal into the River Tweed is not viable due to constraints from SEPA and loss of high value tourist salmon fishing and environmental damage. (252)</p> |
| <p>Growing your economy: Question 6</p> | <p>MESHI001, Land at Eshiels I, Eshiels</p> | <p><u>Siting of industrial buildings:</u></p> <p>The contributor states that they do not think that the siting of industrial units within a housing development is appropriate. (292)</p> |
| <p>Growing your economy: Question 6</p> | <p>MESHI001, Land at Eshiels I, Eshiels</p> | <p><u>Lack of services within Eshiels:</u></p> <p>The contributor states that Eshiels currently has no pub or shop. Housing development should surely be focussed on places that can offer residents some local services. (300)</p> |
| <p>Growing your economy: Question 6</p> | <p>MESHI001, Land at Eshiels I,</p> | <p><u>Lack of benefit to Peebles High Street:</u></p> <p>The contributor states that the majority of householders will have to commute to work by car to work in</p> |

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| | Eshiels | Edinburgh, there is likely to be little benefit to the Local High Street in Peebles, as most commuters will shop in larger centres, such as Straiton. (269) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <u>Proposed use for the site:</u> The contributor cannot conceive how any business use land could be profitably operated in the site, even assuming both are approved. The community size is too small to sustain any retail operation, and proximity to Peebles would further reduce that. Catering facilities in Peebles have been criticised in recent years as being oversupplied, so it is difficult to conceive any catering at Eshiels would be able to compare. That only leaves light industrial, however the contributor would contend that an expansion of Cavalry Park would be far more in keeping, and far more likely to be commercially viable. (267) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <u>Pressure from developers:</u> The contributor states that the impression they get, is that the developers are pushing for more housing in the Peebles area. (257) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <u>Does not align with overall aims of strategy:</u> The contributor states that the development of this site does not align with the overall aims of the development strategy because the aims set out by the Council regarding sustainability and climate change seek to increase commercial woodlands whereas development of these sites would reduce this aspect. (252) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <u>Broadband infrastructure:</u> The contributor raises concerns regarding the lack of suitable broadband infrastructure. (239) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <u>Existing use on the site:</u> The contributor raises concerns that Forestry Commission do not appear to have been consulted at the appropriate level as to the impact of the proposed development on the use of the new Forest Lodges, on major events where the Forestry Commission use these fields for additional parking, nor has it been considered the impact on parking more generally, in reduced appeal of Glentress generally if the development goes ahead, and more specifically the loss of revenue for the Forestry Commission of cars parking in the new development in preference to the paid car parks, nor any provision to mitigate the impact of this on the residents of the proposed developments. (239) |
| Growing your economy: | MESHI001, Land at | <u>Local economy:</u> |

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| Question 6 | Eshiels I, Eshiels | The contributor states that the development would damage the local economy and is counter to Policy ED7. They also raise concerns that it is likely new arrivals will be commuters to Edinburgh, with there being a lack of economic spending. (216) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <u>Housing tenure:</u> The contributor states that the housing will be for the affluent people from outwith the Borders. A few 'affordable' houses thrown in will not solve housing problems for people who live here. (235) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <u>Light pollution:</u> The contributor raises concerns regarding the introduction of light pollution for the first time, to the hamlet. (197) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <u>Contrary to MIR statement:</u> The contributor raises concerns that the proposal is contrary to the MIR statement, regarding the protection of the Scottish Borders Countryside and sustainable travel principles. (197) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | <u>Settlement boundary:</u> The contributor states could/should Eshiels seek to be a settlement boundary especially if the plan goes ahead? (276) |
| Growing your economy: Question 6 | MESHI001, Land at Eshiels I, Eshiels | SEPA state that in respect of co-location, Peebles STW (CAR) and Eshiels community recycling centre (WML) are located across the road and to the west of the site. These sites are however unlikely to have an impact on the site from SEPA's perspective. Possible odour issues from the STW would be dealt with by SBC Environmental Health. There is a watercourse that runs through/adjacent to the site which should be protected and enhanced as part of any development. Therefore, a site requirement is needed to ensure that a maintenance buffer strip of at least 6 metres wide is provided between the watercourse and built development. Additional water quality buffer strips may be required. It appears that there may be a culverted watercourse at the southern end of the site. It is therefore recommended that a site requirement is attached requiring a feasibility study including a flood risk assessment to be undertaken prior to development to assess the potential for channel restoration. SEPA require an FRA which assesses the risk from the Linn Burn and any small watercourses which flow through and adjacent to the site. The River Tweed may also require consideration. Consideration will need to be given to bridge and culvert structures within and adjacent to the site which may exacerbate flood |

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| | | <p>risk. Due to the steepness of the adjacent hill slopes we would also recommend that consideration is given to surface water runoff to ensure the site is not at risk of flooding and nearby development and infrastructure are not at increased risk of flooding.</p> <p>There is a surface water hazard identified.</p> <p>There is no public foul sewer in the vicinity and if this site was to be developed this would be an opportunity to provide first time sewerage provision to Eshiels, picking up existing properties also. Any private sewerage provision would be likely to require to discharge to the River Tweed rather than the Linn Burn. The watercourse that runs through/adjacent to the site should be protected and enhanced as part of any development. It appears that there may be a culverted watercourse at the southern end of the site. Depending on the use of the proposed site, there may be a requirement for permission to be sought for certain activities from SEPA. (119)</p> |
| Growing your economy: Question 6 | MESHI002 Land at Eshiels II | <p>The contributor confirms that they own the northern field within site (MESHI002) and support the inclusion of the site within the MIR.</p> <p>Considers that access would be better achieved via the entrance to Glentress, then left through their small car park and into the field which the Forestry Commission now own, to the south of their field. There is already a gate, as they use the field for over spill car parking on event days.</p> <p>The entrance to Glentress has already been widened, although there is scope for more, and there is a filter lane on the main road for those crossing the traffic. (19)</p> |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <p><u>General:</u></p> <p>The contributor objects to the inclusion of (MESHI002) within the MIR. (189)</p> <p>The contributor states that the population density of the Eshiels development alone has 30% households per hectare. (276)</p> <p>Advises that 240 houses will swamp the existing community, linking Peebles to Cardrona, with a major loss of good quality agricultural land and jobs essential to the economy. (20)</p> <p>The contributor highlights that the supporting document makes reference to a sawmill at Eshiels, which has not existed for over 20 years. (150)</p> <p>There are inconsistencies between the proposals and existing SBC policies. (166)</p> |

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| | | <p>The contributor states that SBC should not try to concentrate so many new developments around Peebles. Instead it should be trying to grow the economy around the train corridor leading to Galashiels. (188)</p> <p>The contributor raises concerns that the three fields are in the middle of nowhere and were selected totally at random for no rhyme nor reason. (201)</p> <p>The contributor states that there are people out there who really care about the area. This is their past and their future, and this is something they are willing to fight for. (249)</p> <p>The contributor states that the suggestion of a mixed use conurbation in Eshiels is absurd. (276)</p> |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <p><u>Deliverability of the site:</u></p> <p>The contributor notes that given the major infrastructure investment required, this has the potential to affect deliverability of the site. Given sewerage capacity continues to be a major factor in site deliverability in the Borders generally, it is considered to be premature to allocate such a large site without knowledge or capacity issues. Notes that a fundamental aspect of site deliverability is landowner and developer willingness and sites should only be allocated where there is such willingness to engage in taking forward the development process. There are no assurances regarding the deliverability within LDP2 timeframe as very little background research has been done, including establishing landowner willingness, as noted above and drainage/water supply capacities (91)</p> |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <p><u>Commuter area:</u></p> <p>Concerns raised that the area will become a commuter area, to the detriment of those who already live there. The contributor states that if Edinburgh has a problem with the lack of affordable housing, it must address those needs itself rather than export the issue to other areas. (108)</p> <p>Contributor raises concerns that residents would need to use their cars to access shops and services. They will just keep going to Edinburgh even in leisure time and not spend money in Peebles or contribute to the community. (141)</p> |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <p><u>Location:</u></p> <p>The contributor states that the location is not suitable for a public transport provision or 'active travel' perspective. Existing provision is unsatisfactory based even on current demand at Eshiels. (91)</p> |
| Growing your | MESHI002, | <u>Coalescence:</u> |

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| economy: Question 6 | Land at Eshiels II, Eshiels | The contributor states that in the event that both (MESH1001 and MESH1002) are developed, there would be significant coalescence of development in this location on the north side of the River Tweed with consequent detrimental impact upon the SLA. (91) |
| Growing your economy: Question 6 | MESH1002, Land at Eshiels II, Eshiels | <p><u>Infrastructure/services:</u></p> <p>The contributors raise a number of concerns regarding the existing infrastructure and services/amenities in and around Peebles. These concerns include the capacity of existing; schools, roads (including parking), sewerage treatment, utility infrastructure and health centres which are already stretched and the requirement for an additional bridge over the River Tweed. More houses in Eshiels or Peebles should not be considered until these facilities are improved first. (20, 23, 69, 141, 145, 155, 166)</p> <p>This is an area of outstanding natural beauty and does not have the infrastructure or facilities to support such a large development. If housing is required then land should be sought with better transport links to local amenities. (38)</p> <p>There are issues regarding school transport and the distance that school children will have to travel to school means that pupils do not qualify for a school bus. (46, 155, 172, 186, 198, 205, 207, 216, 239)</p> <p>Raised concerns regarding the current infrastructure provision (this includes reference to schools, health centres, roads, parking, fire/police/ambulance services, water, electricity, gas, and sewerage facilities). (53, 59, 83, 90, 139, 149, 179, 180, 194, 197, 201, 205, 252, 257, 292, 300, 209, 217, 229, 235)</p> <p>The contributor stats that there would need to be local infrastructure improvements if the developments at Eshiels were to go ahead, including; road lay-out on the A72, new sewerage provision and new water pumping station to get the water up the hill. The developers should be responsible for funding these. (155)</p> <p>The contributor objects to the inclusion of the site and states that the site is not considered to be capable of being delivered within the LDP lifespan due to the significant infrastructure constraints which have not been sufficiently researched to date. These include; landowner willingness, sewerage capacity, water treatment capacity, archaeological constraints and roads infrastructure requirements. Other significant material infrastructure constraints include school capacities and healthcare facilities. (91)</p> <p>The contributor states that the existing access is not suitable. Major investment would be required to create a new 'through route' access within the sites and new junctions with the A72. The viability of the investment requirement is unknown, which could realistically affect deliverability. There is no direct and</p> |

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| | <p>sustainable off-road link to Peebles. The walkway/cycleway is located to the south of the recycling centre with the nearest connection points onto the route being at some distance from the site and requiring crossing of the busy A72. Without a new safe off-site route to Peebles which is constructed to directly connect with the site, there would be an increased number of pedestrians which would have to use the existing pavements adjacent to the busy and fast road, this putting more pedestrian traffic at risk. Furthermore, as the site is over 3 miles away from the High School, children would not be entitled to a school bus pass. (91)</p> <p>Concerns are raised that the development will result in an increase in the population, which will put pressure on the existing infrastructure and services residents would require, including schools, doctors and social services. (108)</p> <p>Concerns are raised that future road expansion will take place along the old railway tracks, which are currently used for walking/cycling. (108)</p> <p>The contributor raises concerns regarding suitable footpaths between Eshiels and Peebles. Highlighting that there is currently a badly maintained narrow footpath. The old railway cycle path does not link Eshiels and Peebles directly. (139)</p> <p>The contributor raises concerns regarding the lack of a safe footpath between Eshiels and Peebles. (239)</p> <p>The contributor states that the majority of home owners within the new proposed dwellings will be commuters and this will have a substantial impact on the quality of the roads between Eshiels and Edinburgh, as well as increasing car miles. (185)</p> <p>There needs to be significant investment in Peebles High School before any significant expansions to the local population can be considered. The contributor raised concerns regarding the capacity of Peebles High School. (185)</p> <p>Haylodge Health Centre is becoming more and more stretched, with growing waiting times for appointments. The contributor highlights that it would take 500 new houses to justify increasing the health centre budget to recruit 1 additional GP. The proposed dwellings would be completely irresponsible given this situation. (185)</p> <p>The contributor states that there is only 1 ambulance covering the area. (185)</p> <p>The contributor states that there will need to be massive changes to the roads, accesses, junctions etc in</p> |
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| | <p>the immediate area of Eshiels to cope with the number of people requiring access to the A72 main road from the new development. This is already a very busy and highly dangerous road. (201)</p> <p>The contributor states that mixed use is not appropriate for the site, due to the narrow access roads. (273)</p> <p>The contributor raised concerns that there is no school bus in Eshiels. (269)</p> <p>The contributor states that commitment to extensive infrastructure improvements are required before any further significant development can take place. (269)</p> <p>The contributor raises concerns regarding the car parking facilities within Peebles and that it cannot cope with the current population. (252)</p> <p>The contributor questions the expansion in infrastructure required. They question how this proposal will link to Peebles, as it is well outside and looks like a housing scheme, stuck in a random field. The Cardrona proposals also have a similar look about them and they wonder about the need for more community infrastructure on the Cardrona site. (243)</p> <p>The proposal would encourage a large amount of school car traffic. (241)</p> <p>The contributor raised concerns regarding the infrastructure requirements and physical ability to re-route the A72, drainage and re-location of existing septic tanks. (239)</p> <p>The contributor advises that measures to support sustainable transport in the form of safe cycling and walking to Peebles, along the A72 are considered through the site requirements and in association with (MESH1001). (213)</p> <p>The contributor states that there is insufficient road and water infrastructure. (235)</p> <p>The contributor raises concerns regarding infrastructure issues, including the A72 as a result of the development. As a result, there will be slowing of moving traffic and a knock on effect of not enough parking provision in Peebles. People may travel to Straiton with the consequent negative effect to the vibrancy and economic health of Peebles. (197)</p> <p>Contributor raises concerns regarding septic tank waste and whether the existing treatment plant can cope with this amount of houses. (197)</p> |
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| | | The contributor states that Eshiels has no amenities and residents will go into Peebles and head to Edinburgh. (197) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <p><u>Surrounding views/key receptors/setting:</u></p> <p>The contributors object to the inclusion of (MESHI002), being regular visitors to the area, including some of the following concerns; impact upon the surrounding views, peace and tranquility of the area. (31, 33, 34, 37, 43, 64, 76, 83, 98, 140)</p> <p>The contributor raises concerns regarding the impact of the development upon the tranquillity of Peebles and the surrounding countryside. (205)</p> <p>Contributor objects to the inclusion of the site. As a local resident who moved from Edinburgh to live in a rural setting which is famous throughout the world, object to houses or communities to be built on their doorstep. (97)</p> <p>Contributor states that the area between Eshiels and Cardrona is exceptionally beautiful. (167)</p> <p>The contributor raises concerns that the views from the tourist cottage will change drastically and objects to the development. (49,96)</p> <p>The development would result in the loss of existing views from many of the current houses in Eshiels. (90)</p> <p>Contributor raises concerns regarding the impact upon the views/landscape/scenery. (50, 52, 53, 149, 202, 239, 243, 320, 233)</p> <p>The contributor states that there would be an unacceptable landscape impact from key receptors along the A72 given the openness and topography of the site. (91)</p> <p>The development will have a huge impact on the scenic character of this beautiful part of the Tweed valley and approach to Glentress, identified as being a major tourist attraction. The creation of a separate development will blight the landscape for tourists, walkers and mountain bikers. (46)</p> <p>The contributor states the impact on the surrounding recreational area of Glentress and surrounding countryside on outdoor activities will be adversely affected. This appears to be counter to Policy ED7. (198)</p> |

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| | | <p>The contributor states that the cycle path allows access to the beautiful green area between Peebles and Cardrona and it should be retained. (249)</p> <p>The contributor states that the rural development plan talks of the importance of the open and sweeping scenic vistas. (276)</p> <p>The contributor states that people enjoy the ‘wilderness’ experience and this must be valued. (243)</p> <p>The contributor raises concerns that the development will destroy their views from the garden and the approach to Glentress Forest and surrounding hills. (227)</p> <p>Contributor raises concerns regarding the visual impact of the development. (197)</p> |
| <p>Growing your economy: Question 6</p> | <p>MESHI002, Land at Eshiels II, Eshiels</p> | <p><u>Scale of the development/character of the area/SLA:</u></p> <p>The contributor states that the scale of the proposed development will blight the lives of the current Eshiels community. (46, 69)</p> <p>Contributor raises concerns regarding the number of houses suggested. They note that other rural sites within the plan have much lower densities. They suggest that a development of around 20 houses within Eshiels would be more appropriate. (300)</p> <p>The contributor states that the development would have a negative impact upon the Tweed Valley. (188)</p> <p>The contributor highlights that Eshiels is not an existing settlement within the LDP and that housing/industrial premises would swamp Eshiels. (139)</p> <p>The contributor states that having a huge development at the entrance to Peebles will take away from the appeal of Peebles. (186)</p> <p>The contributor raises concerns regarding the unique organic character and development pattern of Eshiels. Housing co-exists with small scale rural and agricultural enterprise, which makes it a very hospitable place where people enjoy living and working. Previous new buildings have been carefully integrated into the landscape and the existing settlement pattern, retained within the original field boundaries. (139)</p> <p>The contributor objects to the development of this site, raising concerns regarding the scale of the proposed development, as well as the location and the impact of which, will be too great upon the</p> |

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| | <p>surrounding area. (51)</p> <p>The contributor states that the development would be out of scale/character for the area. (90, 98, 140, 142, 150, 158, 166, 178, 179, 180, 185, 188, 186, 194, 198, 201, 241, 268, 269, 276, 298, 207)</p> <p>The contributor states that the development would severely detract from the current atmosphere and attractiveness of the area. (149)</p> <p>The proposal for the two Eshiels sites exceeds the number of houses/businesses for the whole of the rest of the Borders and are completely out of proportion. The site is unwelcome urbanisation. (172)</p> <p>The site is out of character and contrary to Policy PMD4 and LDP2MIR para 3.6. (172, 185, 186, 198, 207, 216)</p> <p>The contributor states that the site is out of proportion. (216)</p> <p>The contributor states that the site is too compact for the proposed development and the scheme shows characteristic indications of overdevelopment. The layout and form is different from other dwellings in the immediate vicinity. Raises concerns that the proposed layout and design features are not informed by any analysis of what should fit respectfully within the local scene and with other sites in the area, merely by site restraints. Development proposals must demonstrate that they, and ancillary activities associated with them, will respect and enhance the character of the site, its context and surroundings in terms of its architectural approach. This poor design does not reflect this. (98)</p> <p>The contributor states that the development would destroy the character of the area. This would be an unwelcome urbanisation of the countryside which will contribute to destroying the uniqueness of the Scottish Borders countryside. (52)</p> <p>The contributor states that the scale of the development is incongruous with the existing settlement, the landscape setting and the SLA, resulting in a loss of openness, with detrimental impact upon the local landscape character. The contributor highlights that the site is very prominent in the landscape setting and specifically on the approaches to and from Peebles. The area is exposed and its development will have a material detrimental impact upon the setting of Eshiels and will appear incongruous within the wider landscape. It is not considered that development of the scale proposed at this location would be based upon a clear understanding of the context or the 'sense of place' of the existing settlement at Eshiels. (91)</p> <p>The contributor states that Eshiels is a designated SLA and additional development as proposed will result</p> |
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| | <p>in the urbanisation of an, essentially rural area. (166)</p> <p>The contributor raised concerns regarding the impact upon the Special Landscape Area. (172, 178, 179, 185, 186, 239, 207, 216)</p> <p>The contributor raises concerns that the site is within the Tweed Valley SLA and is therefore due to special protection from insensitive development such as those proposed. It is not of an appropriate scale, will have a major landscape impact, and will prejudice the character of the area. The proposed developments are not appropriate and counter to existing policies. It represents unwelcomed urbanisation of the countryside which will contribute to destroying the uniqueness of the Scottish Borders countryside and biodiversity. (155)</p> <p>The contributor states that the site is located within the heart of the Tweed Valley SLA where management recommendation include taking great care with development on settlement edges. Development of either or both of the Eshiels sites would materially and detrimentally impact upon the SLA and the features for which the designation exists and may have a materially detrimental impact upon tourism. (91)</p> <p>The contributor states that the location of business or industrial land in close proximity to the A72 is likely to have a greater detrimental impact upon the landscape setting than housing of appropriate density, with any landscaping taking many years to mature as has been the case, and continues to be the case, at Cardrona. (91)</p> <p>The contributor states that this development would produce a highly visible development, visible from the road, and just as visible as the over development of the Kittlegairy estate. An almost continuous development along this road would be the result, spoiling the view for residents and visitors alike, and having an adverse effect on the whole valley. (108)</p> <p>The contributor states that the development would result in the loss of landscape characteristics evident within the Borders landscapes, including hardwood planting and shelter belts, as well as agricultural land. The Council should perhaps look at Eshiels and use it as a model for placemaking in other parts of the Borders. (139)</p> <p>The contributor objects to further proposals for more urban development in the Tweed Valley around Glentress. One of the great attractions of Glentress as a destination is that it feels like it is out in the country and the approach has an attractive ambience. (154)</p> |
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| | <p>The contributor states that 240 units is wrong for a number of reasons in an area where there are currently only around 20 houses. (155)</p> <p>The contributor states that the intensity of development of housing and business premises on the two Eshiels sites is excessive and equates to more than is proposed for the 'preferred' sites in the remainder of the SBC area. (166)</p> <p>The contributor states that any developments should be appropriate to the immediate environment and therefore be only on a small scale (eg) small groups or individual properties in keeping with the surroundings. (201)</p> <p>The contributor states that making Eshiels a much bigger satellite of Peebles will destroy the countryside feel of the Western Borders. (223)</p> <p>The contributor states that they are a regular visitor to Glentress as a keen mountain biker and these proposals would badly effect the surrounding area. (266)</p> <p>The contributor raises concerns that Eshiels is a small settlement located in the beautiful Tweed Valley with stunning views. There has been a settlement in the Eshiels area for well over 200 years. The current settlement is made up of mainly single housing ranging in age from Victorian to modern day. (292)</p> <p>The contributor states that the current approach to Glentress forest is in keeping with the surrounding countryside that attracts people to the area. Developing this area for housing will severely detract from its current atmosphere and attractiveness. (292)</p> <p>The contributor states that, if the development was implemented, it would transform the area from a rural environment to a more urban one potentially reducing the quality of life for the existing residents. (293)</p> <p>The contributor states that the development site is in a Special Landscape Area and development on the proposed scale would make a mockery of this designation. (298)</p> <p>The contributor considers that the proposed development would result in the area becoming urbanised. (271)</p> <p>The contributor raises concerns at the loss of the countryside. (268)</p> <p>The contributor raises concerns regarding the density and scale of the proposed development, stating that</p> |
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| | | <p>if it is anything like Cardrona, the number of houses will treble as is happening there. (257)</p> <p>The contributor states that the proposed development seems at odds with the landscape/out of proportion. (239, 243)</p> <p>The contributor states that the urbanisation would be most unwelcome in this rural economy. (216)</p> <p>The contributor states that locating a big mixed use site so close to Glentress is crazy, it will detract from the wild natural beauty which is part of the attraction of the Seven Stanes Leisure Facility (into which millions is being poured). They state that an alternative would be to locate more business/industrial units why not use March Street Mills. (217)</p> <p>The contributor states that the area is of great beauty and this type of development would be out of scale to the existing settlement. (229)</p> <p>The contributor states that development of the proposed magnitude would ruin the approach to Glentress and Peebles. Peebles will be ruined and it will be just another struggling town. The uniqueness of Peebles and the surrounding countryside should not be spoilt for the sake of the greed of the developers. (233)</p> <p>The contributor raises concerns regarding the over development in the vicinity of Eshiels. (206)</p> <p>The contributor states that it is too big a development in a badly chosen location. The proposed mixed use sites would detract from the approach to Glentress and Peebles from the east, one of the delights of the eastern entrance are the open spaces, fields, woodland etc on the north side of the road. (197)</p> <p>The contributor raises concerns regarding the number of units proposed, which would swamp the existing hamlet and cause logistical problems. (197)</p> <p>The contributor raises concerns regarding the impact upon the special scenic area, impact upon the character of the area and visual damage to the landscape. (197)</p> <p>Current policy EP5 helps to protect against inappropriate development in the Special Landscape Area. These proposals are inappropriate and should be rejected. (318)</p> <p>The contributor does not consider that the siting of industrial buildings alongside housing is appropriate. (149)</p> |
| Growing your | MESHI002, | <u>Tourism:</u> |

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| <p>economy: Question 6</p> | <p>Land at Eshiels II, Eshiels</p> | <p>The contributor objects to the inclusion of (MESH1002) and the potential impact upon tourism. (37, 40, 48, 49, 50, 51, 53, 64, 83, 98, 140, 141, 142, 149, 178, 179, 186, 197, 202, 239, 241, 243, 257, 266, 268, 269, 300, 320, 271, 209, 227, 229, 233, 235)</p> <p>The contributor states that the area will become less attractive to walkers and cyclists. (188)</p> <p>The contributor raises concerns that such a development will make Glentress less appealing if it is surrounded by housing and business estate. (186)</p> <p>The contributor states that these areas of natural beauty are becoming less and less now and they are sure that the Scottish Tourist Board must have also made their concerns heard. (76)</p> <p>The contributor states the development of this site would have a detrimental effect on tourism and people's enjoyment of the Tweed Valley. (52, 69, 90, 139, 188)</p> <p>The contributor raises concerns that Glentress has an international reputation as a centre of excellence for mountain biking. (139)</p> <p>Whilst there may be benefits of having additional tenants in the area, the area is one of beauty where the contributor visits regularly and tourism is extremely important for the area. Mountain biking and outdoor pursuits in Glentress are a year round activity, generating income for the area. Building more houses would really take detriment and adversely affect tourism. (32)</p> <p>The contributor states that Glentress mountain biking is celebrated all over Britain for its spectacular biking in the heart of the Tweed Valley. Having a huge development would have a negative effect on families, mountain bikers and hikers visiting the area. (51)</p> <p>The contributor objects to the inclusion of the site, as any such development would be incompatible with the existence of the Tweed Valley Forest Park and the declared intention to developer tourism at Glentress, in the town of Peebles and in the Tweed Valley generally. (59)</p> <p>The proposal for these two sites will detract from the tourist potential of the area and hence its economic development by blighting the visual approach to Glentress and the views from within the forest outwards. Glentress is a highly successful tourist destination, for walkers and mountain bikers, also people visiting the immediate area. Tourists will be put off the area if it is part of an urban sprawl. There is an increasing number of other mountain biking areas with which Glentress is competing and the proposed development</p> |
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| | <p>will only make it a less attractive option amongst these. (90)</p> <p>The contributor states that increasing the settlement along the A72 risks an increase in the number of accidents, in particular cyclists coming off the hill routes quickly, straight onto the A72. (108)</p> <p>Further proposed development, particularly on the scale suggested for the Eshiels area near the entrance to Glentress, feels like further urbanisation of this beautiful location which will hugely detract from its attraction as a destination for visitors. (154)</p> <p>The contributor raises concerns that the development will remove a sense of countryside experience which will impact negatively on tourism. (155)</p> <p>The contributor states that the proposed uses are inconsistent with and are potentially damaging to the type and nature of tourism development taking place at Glentress and the expectations of the visitors who are and will be attracted to it. (166)</p> <p>The contributor states that the area provides a range of recreational activities; mountain biking, horse riding, golf, walking, cycling and fishing. The suggested development will destroy much of the attraction of this area and undermine ongoing investment in the recreational facilities. (167)</p> <p>The contributor states that Glentress is used for walking, running and camping. The proposed dwellings will have a substantially negative impact on the attractiveness of Glentress as a tourist destination, and being able to deliver a positive experience for customers. (185)</p> <p>The contributor states that Eshiels is an area of natural beauty which attracts a huge number of visitors, particularly to Glentress. They raise concerns that the proposed large scale development would spoil the visitor experience to the area. (201)</p> <p>The contributor raises concerns regarding the impact of the development upon Glentress for biking. The development would take away the peacefulness. (205)</p> <p>The contributor raises concerns that development on this site would ruin the countryside of the area including Glentress which is one of the areas key tourism hotspots. (246)</p> <p>The contributor states that the urbanisation, apart from biodiversity impact, will change the experience for 300,000 visitors to Glentress alone never mind the other mountain bike trails. (276)</p> |
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| | | <p>The contributor states that Eshiels is the gateway to Glentress forest which is part of the world famous 7stanes bike parks which attracts over 300,000 visitors to the area annually. (292)</p> <p>The contributor raised concerns regarding the impact upon Glentress/Tweed Valley. (257, 268, 269, 271, 300)</p> <p>The contributor raises concerns that development on this scale and in this area would form a visual corridor which would have a significant impact on the landscape value for tourism, right next to one of the Scottish Borders biggest tourist attractions, Glentress Forest. (239)</p> <p>The contributor states that the development would have a detrimental economic impact on the Glentress area which is the main tourist destination (e.g) mountain biking, walking, Go Ape. This is counter to Policy ED7. (207)</p> <p>The contributor states that the development would have a massive hit on the economic development of the Glentress area as a draw for walking and mountain biking tourists. (216)</p> <p>The contributor states that any development in the immediate area of Glentress should be tourist related, rather than aimed at small businesses which should be located on brownfield sites. (216)</p> <p>The contributor states that these sites are in the open countryside and major development in this area will detract from the quality that the visitors value so much from visits to the Scottish Borders. (30)</p> <p>The contributor raises concerns that the site would be adjacent to the Forest Holidays development within Glentress, the proposal would blanket that area with development. (206)</p> <p>Glentress Forest is one of the principal tourist attractions in this part of the Borders and has attracted considerable investment for leisure facilities including a holiday complex, outdoor tree activities as well as developing as a significant mountain biking centre. Any major development in this location begins to urbanise the countryside and detracts from what tourists and visitors are seeking, peace and tranquillity. Given that Peebles is becoming increasingly dependent upon tourists for its long term survival, any development that hinders its progress in this regard has to be challenged. (318)</p> |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <p><u>Land economics:</u></p> <p>Contributor raised concerns at the inclusion of (MESHI002), in respect of land economics. (24)</p> |
| Growing your | MESHI002, | <u>Traffic concerns:</u> |

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| economy: Question 6 | Land at Eshiels II, Eshiels | <p>The contributor raises concerns regarding the impact upon traffic and the A72/surrounding road networks/parking/potential for accidents. (20, 52, 69, 90, 108, 139, 141, 142, 145, 149, 155, 158, 166, 167, 172, 185, 186, 197, 198, 201, 202, 239, 241, 243, 269, 271, 276, 292, 293, 300, 207, 216, 229)</p> <p>Concerns that the development will create a lot of extra traffic as people will inevitable drive to Peebles for various services. (46)</p> <p>Concerns are raised that if business units were to be located at Eshiels this could increase the likelihood of large vehicles/lorries in the vicinity. (202)</p> <p>The contributor states that the proposal is neither rural or urban, as it is within the school catchment distance and yet the pupils have no bus available but have to walk along the side of an increasingly busy A72. The alternative is for parents to transport them to school by car, across the bridge thereby increasing further congestion in Peebles. (271)</p> <p>The contributor states that the development will result in a considerable increase in traffic, as every house will have a minimum of 2 cars, every business will have at least 2 cars. The town could not cope with all the extra traffic. (235)</p> <p>The location is sufficiently remote from the town and its facilities that it will be inevitable that a development of the type proposed will have a significant impact upon road traffic. Given the need to use cars more to access shops, where will these extra cars park? Peebles is already running short of adequate parking facilities; there are very few, if any, sites that could be used for car parking. (318)</p> |
| Growing your economy: Question 6 | MESH1002, Land at Eshiels II, Eshiels | <p><u>Noise and air quality:</u></p> <p>The contributor raises concerns regarding noise and air quality, as a result of the development. (20)</p> |
| Growing your economy: Question 6 | MESH1002, Land at Eshiels II, Eshiels | <p><u>Ribbon development and green belt:</u></p> <p>The contributors raise concerns that development on this site would be ribbon development. (23, 139, 149, 150, 155, 172, 178, 179, 185, 186, 197, 198, 205, 241, 269, 276, 292, 207, 216, 229)</p> <p>The Borders is known for its vast and grass fields and rolling hills, by adding these houses Peebles and Cardrona will be inadvertently forced together while simultaneously wiping away the grass fields that make the Borders so special. (180)</p> |

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| | | The contributor states that building in Eshiels will connect the Borders corridor, with housing stretching from Peebles to Cardrona, spoiling much of the countryside and changing these areas from a peaceful small town to a disruptive large town. (205) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Health & well-being/amenity of existing residents:</u> The contributor states that the development of (MESHI002) would impact upon the health and well-being of the existing residents. (43) The development would have a negative effect on the amenity of the existing residents at Eshiels. These contributors include reference to; noise, light and dust pollution. (90,95) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Dark skies lost:</u> The contributor states the development will result in the loss of Peebles dark sky. (51, 69, 90, 276) The contributors raise concerns regarding the impact of the development upon the Eshiels dark sky environment. (139, 149, 155, 186, 197, 292) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Loss of agricultural land:</u> The contributor states that a great deal of agricultural land will be lost along with the rural jobs associated with the land. (69) The contributor states that the development would cause the destruction of ancient pastures. (108) The contributor states that the development would result in the loss of prime quality agricultural land. (30, 149, 166, 205 292) The contributor raises concerns at the loss of good quality agricultural land and the impact on agricultural employment essential to the economy of the Scottish Borders. (155) The site will result in the removal of agricultural land counter to Policy ED10. (172, 185, 186, 198, 207, 216) Contributor raises concerns regarding the loss of green belts and agricultural land. (241) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, | <u>Loss of existing community within Eshiels:</u> The contributor states that the proposed development would mean the existing community would be lost. |

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| | Eshiels | (69, 186) The contributor fears this small rural community may be permanently scarred by this proposal. (201) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Burn:</u> The contributor raises concerns regarding the slippage of land adjacent to the burn which runs along the north side of the plateau fields in the valley, north of the River Tweed. The natural embankment (a significant length of where the western end of the new build is proposed), could disintegrate. (88) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Indicative site capacity:</u> The contributor states that the indicative site capacity for this site and (MESHI001) is greater than the 'preferred sites' for the whole of the Borders. (90) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Flood risk:</u> The contributor states that the development would increase flooding risk for the housing and fields below the road. (90, 235) The contributor states that the development may lead to flooding of areas to the south of the A72. (166) The contributor states that a section of this site at the south side, appear to lie within an area of flood risk presented by the River Tweed. There is genuine risk of increased risk of surface water flooding once the development has taken place. (91) The contributor states that there was widespread flooding 2 years ago along the Tweed Valley, which demonstrated that the A72 is very vulnerable to flooding, for much of its length it is also at risk from erosion by the River Tweed. Putting further housing in an area where its vital routes are at risk, would be irresponsible. There are no alternative routes in the event of flooding. Building over agricultural land will prevent rainfall moving slowly through the soil, run-off will be swifter and this will exacerbate flooding. (108) The contributor highlights that the main road and lower field at Eshiels are subject to flooding every time there is heavy rain. The building of new roads and new paved parking areas would add to this problem. (139) The contributor raises concerns there will be a significantly increased flood risk for the existing houses especially as the land does not drain well at present. Furthermore, likely to be increased risk to the A72 where there are frequent flooding issues. (150) |

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| | | <p>The contributor states that although the 2 sites are not currently in the SEPA flood risk zone this will change drastically once the agricultural land is removed contributing to faster run-off, increasing the rate at which rainwater falling on the proposed new development reaches the Tweed. SEPA would need to investigate with revised models. (155)</p> <p>The contributor raises concerns regarding flood risk as a result of development on this site/surrounding area/roads. (172, 198, 205, 269)</p> <p>The contributor states that the land adjacent to the proposed dwellings is prone to flooding, and this has often encroached onto the A72 road. With rising water tables and west weather, 26 hectares of tarmac'd land would need significant investment in drainage for the whole area. (185)</p> <p>The contributor states that the areas at the bottom of the fields act as flood plains at the moment with housing here the road and houses opposite will be subject to flooding. The road currently floods over the road when heavy rainfall. (241)</p> <p>The contributor raises concerns regarding the potential for flooding from the hills into the fields. (239)</p> <p>The contributor states that the development adjacent to the flood plain would increase the risk of flooding to homes/buildings/fields below the A72. (207)</p> <p>The contributor raises concerns regarding flood risk as a result of the development, for the houses and fields below the A72, due to 27 acres of developed/tarmacked land close to the floodplain. (216)</p> |
| <p>Growing your economy: Question 6</p> | <p>MESHI002, Land at Eshiels II, Eshiels</p> | <p><u>Sewerage disposal:</u></p> <p>The contributors raise concerns regarding the main sewage system, capacity and the fact that the site is downstream of the works. (90, 139)</p> <p>The contributor states that there is no public sewer at Eshiels. The level of investment which would be required in order to service both sites is currently unknown. (91)</p> <p>Contributor raises concerns regarding the problems of sewerage disposal/treatment from the site. (172, 197, 198, 269, 293, 207, 216, 229, 235)</p> <p>The contributor advises that the proposed number of dwellings would have a detrimental impact on sewage processing at Eshiels Recycling Centre, along with the ability to process all waste from these</p> |

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| | | <p> dwellings. (185)</p> <p>Apart from some low level comment regarding WWTW and WTW, which are assumed to refer to waste water treatment and sewerage, there is little or no consideration as to how levels of waste and sewerage will be dealt with. This site is downstream of the existing sewerage facilities that serve Peebles. (318)</p> |
| <p>Growing your economy: Question 6</p> | <p>MESHI002, Land at Eshiels II, Eshiels</p> | <p><u>Natural heritage/archaeology:</u></p> <p>The contributor states that the development would not protect or enhance the natural heritage of the area. (90)</p> <p>The contributor raises concerns regarding the impact that developing the site will have upon archaeological interest. A Roman settlement was once situated there and there are many artifacts which remain buried. If building works is carried out many of the remains will be destroyed. (194)</p> <p>The contributor states that there is a tree preservation order to the west of the site boundary. (91)</p> <p>The contributor states that there are archaeological/heritage constraints within part of the site. Installation/upgrading of infrastructure may detrimentally impact upon these interests. (91)</p> <p>The contributor states that development may cause damage to the historic sites, buildings and artefacts close to the access road. (108)</p> <p>The contributor states that this is an historic and close knit peaceful community, with its roots in post WW1 social change and history in arboriculture. Numerous artefacts alongside the roads and tracks would be at risk. (108)</p> <p>The contributor states that the allocation has the potential for direct and setting impacts on scheduled monument SM3667 Eshiels Roman Camp. They are content with the principle of development in this area and welcome the inclusion of mitigation requirements for an adequate buffer zone to protect the physical remains and setting of Eshiels Roman Camps, a suitable management regime for the section of the monument within or adjacent to the development area, and for any infrastructure upgrades to avoid impacts on the scheduled monument. They note that a masterplan would be required for these sites, and recommend early consultation with HES on the development of any masterplan that may emerge. (164)</p> <p>The contributor raises concerns that the development will disrupt the site of archaeological interest, the Roman marching camp that is situated on both sides of the A72. (167)</p> |

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| | | The contributor raises concerns in respect of the archaeological impact of the new infrastructure on the local scheduled monuments. (239) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Greenhouse gas emissions:</u> The contributor advises that the development would not reduce the need to travel or greenhouse gas emissions. (90) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Biodiversity:</u> The contributor advises that the site presents moderate biodiversity constraints including potential impact upon the River Tweed SAC/SSSI. (91) The contributor states that the proposal would have a reduction of biodiversity counter to Policy EP3. (172, 207) Contributors raise concerns including the following; impact upon local wildlife/ecology/biodiversity/TPO's (108, 140, 167, 179, 185, 202, 239, 241, 216) The contributor raises concerns in respect of the environmental impact upon biodiversity. (239) The contributor raises concerns regarding the environmental impact from the development. (197) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Impact upon River Tweed SAC:</u> The contributor states that the proposal would increase the risk of pollution to the River Tweed and its tributaries. (108) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Landscape (SNH):</u> The contributor states that this site shares many of the characteristics of (MESHI001), although the degree of set-back from the A72 offers somewhat greater potential to integrate this site with its surroundings and the local landscape character than the current boundary of (MESHI001). If allocated, a strong approach to place-making should be adopted in order to ensure local identity and appropriate facilities are delivered, including green infrastructure. As with (MESHI001), the contributor strongly advises that is this site is to be allocated, in full or part, that the placemaking aims for the site are clearly articulated in advance. They suggest that in combination with the neighbouring site (MESHI001), the design intention for neighbourhood functions, the urban form, the |

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| | | density of development and the approach to design led landscape mitigation, across both sites should be clearly set out in the LDP. They advise that in order to produce a coherent approach to a new settlement pattern in this location, an integrated approach to urban form which considers views and design relationship/set back of development from the A72, will be required through a clearly communicated site development brief. (213) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Co-location issues:</u> The contributor highlights that there may be co-location issues, including odours, with the nearby Peebles waste water treatment works and the adjacent Eshiels recycling centre. (91) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Core path:</u> The contributor states that the proposed allocation to the west (MESHI002) has a core path running through it. (91) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Lack of vision for the site:</u> The contributor states that there appears to be a conflict within the Council as to the most suitable use for the site (MESHI002). The Landscape Officer states that the site would be best suited to housing, while the Economic Development states that the site would be more appropriate for commercial/tourism based mixed use development. It is of a concern that there is not a shared vision for the sites at this stage. (91) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Suggested limitations on construction works:</u> The contributor suggests that the following limitations are put on any construction work; <ul style="list-style-type: none"> - Sound barriers put in place between their property and the proposed construction works - Acceptable type and level of noise be decided upon, monitored and enforced by Environmental Health Officers on a regular basis - Environmental Health Officers to monitor the amount of light pollution on their property - Environmental Health officers to monitor the proposed construction site to ensure that the dust and smell levels - Request that vehicle movements on the small rural road be limited to specific traffic times and restricted number of vehicles that pass by at any given time - Request restrictions on the working hours to set times of the day, as to minimise noise pollution during unsociable hours and that no construction works take place on the weekends. (95) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, | <u>Access to an existing property:</u> The contributor states that the proposed entry barrier/gate on the planning application will be situated |

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| | Eshiels | directly in front of their property and it will restrict visitors, traffic and movement to their house. Therefore, the contributor requests that the barriers are altered or moved further up the road running alongside their property and/or to install separate barriers at the entrance at the individual car parks so that movement to access their house is not restricted. (95) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>De-value existing properties:</u> The contributor states that the proposal will devalue existing properties. (98) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Design:</u> The contributor states that any development must be designed to a high standard, avoid unacceptable impacts on amenity, and demonstrate social, economic and environmental sustainability. Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. (98) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Carbon foot print/sustainability:</u> The contributor states that an increase in the number of houses (and their occupants) will mean people doing more journeys to get to work, shops etc as there are no facilities close by. This is at odds with the reports stated aim to decrease the carbon footprint in the area. (108) The contributor raises concerns that the development will make each household less sustainable as more fossil-fuel miles have to be made to Peebles to shops and schools. (155) The contributor raises concerns regarding the additional carbon emissions, as most homeowners will be commuters. This is counter to the overall SBC objective to be more sustainable by reducing car miles. (172) The contributor states that with such a significant amount of housing proposed this is counter to the overall SBC objective to be more sustainable by reducing car miles, especially as most new home owners will be commuters. (186) The contributor raises concerns that the location of the site will mean the majority of housing if not all will be heavily reliant on private vehicles which does not make this proposal a more sustainable in accordance with LDP MIR para 2.15. (198) The contributor raises concerns that the focus of the LDP is targeting the wrong transport corridors and proposing a higher level of carbon emissions which is contrary to the council's objective of increased |

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| | | <p>sustainability and reduced carbon road miles. (201)</p> <p>The contributor raises concerns that the development would add significantly to carbon emissions, as the majority of house owners will commute to work. This is counter to the overall SBC objective to be more sustainable by reducing car miles. (292)</p> <p>The contributor states that residents will need to drive to work in Edinburgh, adding to the traffic congestion and pollution. (252)</p> <p>The contributor states that you will be adding to the carbon footprint as it will be family housing with more commuters where car is the only available transport. (241)</p> <p>The contributor raises concerns regarding the increased carbon emissions as a result of the development. (239, 229)</p> <p>The contributor raised concerns regarding the carbon emission increase, as most house owners will be commuters. This is in the opposition to the overall SBC objective to reduce car miles and increase sustainable lifestyles/living. LDP2 MIR para 2.15. (207)</p> <p>The contributor raises concerns that the proposal contradicts the promotion of sustainable travel principles in section 5.8. Development along the A72 will encourage more private car miles, where development along the Borders railway would increase returns on the public expenditure on that public transport. (209)</p> <p>The contributor raises concerns that more cars means more carbon emissions, which is against the SBC objective to be more sustainable by reducing car miles (LDP2 MIR Para.2.15) (216)</p> <p>The contributor raises concerns regarding the extended fossil fuel pollution as a result of the development. (197)</p> |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <p><u>Food security:</u></p> <p>The contributor raises concerns regarding food security. The need for a secure local food supply increases, and destroying good agricultural land by building on it is unwise. Land unsuitable for food production should be the land put forward for building, it may be more expensive for the developer, but then it would be even more expensive to try to produce essential food from unsuitable land. (108)</p> |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, | <p><u>Disproportionate/alternative locations for development:</u></p> <p>The contributor states that the scale of the proposed mixed use site is disproportionate to the</p> |

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| | Eshiels | <p>developments proposed elsewhere in the Borders. (201)</p> <p>The contributor raises concerns regarding high number of houses proposed compared to other areas and proportion of the total number for the Borders. (241)</p> <p>The contributor states that the sites are looking to deliver the largest number of houses of the whole plan, in a hamlet that is not even identified as a settlement. The proposal is disproportionate to the size of the small settlement which currently exists. (239)</p> <p>The contributor states that the number of houses/businesses suggested for the Eshiels sites on its own is greater than the 'preferred sites' for the rest of the Scottish Borders, which is shocking and totally disproportionate. (207)</p> <p>The contributor states that the number of units (240) for 2 preferred sites at Eshiels is greater than for the whole of the rest of the Borders, which is out of proportion. (216)</p> <p>The contributor states that the proposal is disproportionate to the overall requirement (3841). (197)</p> <p>The main settlements are the areas which should be developed Borders wide, developing very small settlements such as Eshiels will cause undue pressure on an already heavily laden services system. (179)</p> <p>The contributor states that the houses proposed would be disproportionate to the total number of proposed houses planned for the whole of the Borders. (185)</p> |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <p><u>Existing business/industrial sites:</u></p> <p>The contributor states that there are a number of existing business units/industrial areas in the town of Peebles that are currently not at full capacity. If business units are at Eshiels it will take business away from the High Street which already has empty premises. (202)</p> <p>The contributor states that they are unaware of any businesses or industry being carried out at Eshiels. They are therefore confused as to why this has been designated as a mixed use development site. (269)</p> <p>The contributor states the businesses based in small units (.g) Calvary Park, whilst making a contribution, are a tiny %. Peebles has in essence become a distant suburb of Edinburgh. Trying to address/improve this by suggesting mixed use development and urbanisation in Eshiels is nonsensical. (207)</p> |
| Growing your | MESHI002, | <u>Amenity:</u> |

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| economy: Question 6 | Land at Eshiels II, Eshiels | <p>They would lose their view and have no privacy as a result of the development. They do not feel that it would be a safe place to raise their family. They chose to live their because of it's rural, scenic and offers space for leisure. (202)</p> <p>The contributor raises concerns regarding the impact upon the amenity, including views, noise and lighting as a result of the development. (249)</p> <p>The contributor states that the volume proposed in Eshiels would be overbearing on the current properties. (276)</p> <p>The contributor raises concerns in respect of the destruction of the visual amenity. (209)</p> |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <p><u>Drainage:</u></p> <p>The contributor states that drainage on the Eshiels site from this proposed development may contribute negatively to the flow of the River Tweed. (276)</p> <p>Contributor raises concerns regarding the drainage from the site. (269, 293)</p> <p>Contributor states that there is no surface water or foul water drainage facilities. The existing capacity of the Scottish Water Sewerage Treatment Works at Eshiels is already being exceeded with limited opportunity for expansion. The option for 'reed bed' treatment and disposal into the River Tweed is not viable due to constraints from SEPA and loss of high value tourist salmon fishing and environmental damage. (252)</p> |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <p><u>Alternative sites/proposals:</u></p> <p>The contributor states that instead of this site, new hamlets can be created or the land can be better used, with smaller expansion in more areas. (205)</p> |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <p><u>Existing use of this site:</u></p> <p>The contributor disagrees with the inclusion of this site within the MIR. The southern part of the site is owned and used by the Forestry Commission as overflow parking for major events. The loss of this area would result in the loss of events and the knock of loss of income to the local economy, and more importantly, loss of reputation of Tweed Valley as the Mountain Biking capital of Scotland. (283)</p> <p>The contributor raises concerns that Forestry Commission do not appear to have been consulted at the appropriate level as to the impact of the proposed development on the use of the new Forest Lodges, on</p> |

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| | | major events where the Forestry Commission use these fields for additional parking, nor has it been considered the impact on parking more generally, in reduced appeal of Glentress generally if the development goes ahead, and more specifically the loss of revenue for the Forestry Commission of cars parking in the new development in preference to the paid car parks, nor any provision to mitigate the impact of this on the residents of the proposed developments. (239) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Siting of industrial buildings:</u> The contributor states that they so not think that the siting of industrial units within a housing development is appropriate. (292) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Lack of services within Eshiels:</u> The contributor states that Eshiels currently has no pub or shop. Housing development should surely be focussed on places that can offer residents some local services. (300) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Lack of benefit to Peebles High Street:</u> The contributor states that the majority of householders will have to commute to work by car to work in Edinburgh, there is likely to be little benefit to the Local High Street in Peebles, as most commuters will shop in larger centres, such as Straiton. (269) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Incorrect maps:</u> The contributor states that there is no existing/operational sawmill as shown on the maps. (269) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Link road to fields to north of MESHI002:</u> The contributor states, in respect of (MESHI002), that consideration should be made to requiring a link road to the fields to the immediate north with a view to future expansion of housing at Eshiels. Without such a link, these fields will be effectively cut off, the existing access road to there is steep, single track and incorporates several sharp bends, with little likely scope for upgrading. No other readily apparent route to these fields exists without going via (MESHI002). (267) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Proposed use for the site:</u> The contributor cannot conceive how any business use land could be profitably operated in the site, even assuming both are approved. The community size is too small to sustain any retail operation, and proximity to Peebles would further reduce that. Catering facilities in Peebles have been criticised in recent years as being oversupplied, so it is difficult to conceive any catering at Eshiels would be able to compare. That only leaves light industrial, however the contributor would contend that an expansion of Cavalry Park |

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| | | would be far more in keeping, and far more likely to be commercially viable. (267) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Pressure from developers:</u> The contributor states that the impression they get, is that the developers are pushing for more housing in the Peebles area. (257) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Does not align with overall aims of strategy:</u> The contributor states that the development of this site does not align with the overall aims of the development strategy because the aims set out by the Council regarding sustainability and climate change seek to increase commercial woodlands whereas development of these sites would reduce this aspect. (252) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Broadband infrastructure:</u> The contributor raises concerns regarding the lack of suitable broadband infrastructure. (239) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Local economy:</u> The contributor states that the development would damage the local economy and is counter to Policy ED7. They also raise concerns that it is likely new arrivals will be commuters to Edinburgh, with there being a lack of economic spending. (216) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Housing tenure:</u> The contributor states that the housing will be for the affluent people from outwith the Borders. A few 'affordable' houses thrown in will not solve housing problems for people who live here. (235) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Light pollution:</u> The contributor raises concerns regarding the introduction of light pollution for the first time, to the hamlet. (197) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Contrary to MIR statement:</u> The contributor raises concerns that the proposal is contrary to the MIR statement, regarding the protection of the Scottish Borders Countryside and sustainable travel principles. (197) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Contrary to Council's vision:</u> The contributor states that the proposed sites do not align with the Councils vision to ensure the economic development opportunities of the Borders Railway corridor are maximised hence they contradict that |

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| | | vision and should be removed. (252) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | <u>Settlement boundary:</u> The contributor states could/should Eshiels seek to be a settlement boundary especially if the plan goes ahead? (276) |
| Growing your economy: Question 6 | MESHI002, Land at Eshiels II, Eshiels | SEPA state in respect of co-location, that Peebles STW (CAR) and Eshiels community recycling centre (WML) are located across the road and to the west of the site. These sites are however unlikely to have an impact on the site from SEPA's perspective. Possible odour issues from the STW would be dealt with by SBC Env health. There is a watercourse that runs through/adjacent to the site which should be protected and enhanced as part of any development. Therefore, a site requirement is needed to ensure that a maintenance buffer strip of at least 6 metres wide is provided between the watercourse and built development. Additional water quality buffer strips may be required. SEPA require an FRA which assesses the risk from the Linn Burn, Eshiels Burn and small watercourses which flow through and adjacent to the site. Consideration will need to be given to bridge and culvert structures within and adjacent to the site which may exacerbate flood risk as well as any transfer of water between catchments. Due to the steepness of the adjacent hill slopes we would also recommend that consideration is given to surface water runoff to ensure the site is not at risk of flooding and nearby development and infrastructure are not at increased risk of flooding. Site may be constrained due to flood risk. SEPA identify a potential surface water hazard. There is no public sewer in the vicinity and if this site was to be developed, this would be an opportunity to provide first time sewerage provision to Eshiels, picking up existing properties also. Any private sewage provision would be likely to require to discharge to the River Tweed rather than the Linn Burn. The watercourse that runs through/adjacent to the site should be protected and enhanced as part of any development. It appears that there may be a culverted watercourse at the southern end of the site. Depending on the use of the proposed site, there may be a requirement for permission to be sought for certain activities from SEPA. (119) |
| Growing your economy: Question 6 | BGREE005, Land South of Edinburgh Road, Greenlaw | SEPA advise that there is a potential surface water hazard on this site. SEPA advise that due to the steepness of the adjacent hill slopes, they recommend that consideration is given to surface water runoff to ensure the site is not at risk of flooding and nearby development and infrastructure are not at increased risk of flooding. |

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| | | SEPA advise that foul drainage from the site must be connected to the existing public foul sewer. Depending on the use of the proposed units, there may be a requirement for permissions to be sought for certain activities from SEPA. (119) |
| Growing your economy: Question 6 | BGREE005, Land South of Edinburgh Road, Greenlaw | The contributor states that they are suspicious where no indication of site capacity given. (197) |
| Growing your economy: Question 6 | BGALA006 (Land at Winston Road I), Galashiels | SEPA advise that this site is located immediately adjacent to the Gala STW (CAR and WML licence). Odour is likely to be problematic from the STW. This would be dealt with by SBC Environmental Health and not SEPA. A suitable buffer should be provided in line with SPP requirements between the licensed sites and the proposed development. This is likely to impact the developable area available. Care should be taken not to damage the river banking as part of any development. SEPA require a Flood Risk Assessment (FRA) which assesses the risk from the River Tweed. Consideration will need to be given to bridge and culvert structures within and adjacent to the site. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. SEPA advise that the site has a potential surface water hazard and water environment considerations. (119) |
| Growing your economy: Question 6 | BGALA006 (Land at Winston Road I), Galashiels | The contributor notes that this would appear to be a sensible use for the site. (197) |
| Growing your economy: Question 6 | BGALA006 (Land at Winston Road I), Galashiels | The Woodland Trust Scotland welcome the provision that potential impact on River Tweed Special Area of Conservation must be mitigated but recommend that the Council works in partnership/consults directly with the Tweed Forum to devise the best mitigation solutions. (199) |
| Growing your economy: Question 6 | BGALA006 (Land at Winston Road I), Galashiels | SNH acknowledge that this site is for re-development of an abattoir and a former refuse tip. The proximity of the former refuse tip site (RGALA003) to the River Tweed SAC means that assessment and mitigation of impacts on the SAC will be required as part of the HRA of the plan. It is not clear what the site requirement “there is moderate biodiversity risk associated with the site which must be given due consideration” refers to. As related site requirements refer to potential for protected species to be present, the supplementary guidance should make clear the need for survey additional to requirements that are identified through the HRA. Further advice on habitats and species survey is available on SNH’s website. |

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| | | (213) |
| Growing your economy: Question 6 | BHAWI003 (Gala Law II), Hawick | The Woodland Trust Scotland (WTS) welcome the requirement to protect and retain existing trees on site. Also the requirement to protect boundary features and mitigate for protected species such as bats, badgers and breeding birds. WTS suggest that surveys of trees and protected species should be required for this site. (199) . |
| Growing your economy: Question 6 | BHAWI003 (Gala Law II), Hawick | SEPA advise that the site has a potential surface water hazard and water environment considerations. (119) |
| Growing your economy: Question 6 | BHAWI004 (Land to south of Burnhead), Hawick | SEPA advise that the site has a potential surface water hazard and water environment considerations. (119) |
| Growing your economy: Question 6 | BHAWI004 (Land to south of Burnhead), Hawick | The proposed site BHAW1004, is not a 'brownfield' site and its development would interfere with the B listed 'tower' of Burnhead. Burnhead House along with the adjoining 'Tower' have been in the Scott family since the 1400's and the current owner would like to ensure the historic setting of this locally important building is not lost. Developing the site at BHAWI004 would, in the contributor's opinion, adversely affect the setting of a Listed Building which is contrary to Policy EP7 of the current Local Development Plan relating to the protection of listed buildings. Additionally, Scottish Planning Policy (SPP) also notes "protecting, enhancing and promoting access to cultural heritage, including the historic environment" should be a guiding principle for policies and decisions. SPP also states that the planning system should: promote the care and protection of the designated and non-designated historic environment (including individual assets, related settings and the wider cultural landscape) and its contribution to sense of place, cultural identity, social well-being, economic growth, civic participation and lifelong learning. It goes on, with specific regard to listed buildings, to state "the layout, design, materials, scale, siting and use of any development which will affect a listed building or its setting should be appropriate to the character and appearance of the listed building". The contributor does not consider the allocation will fit all these requirements. Furthermore, the land in question is currently tenanted by a local farmer, removing this arable land would make economies of scale less possible (110 ha to 100ha = 10% area lost), which would in turn compromise their ability to care for the environment. At para 4.11, the Council's proposals rightly suggest more weight should be given to economic development benefits within planning policy within LDP2 for new businesses, leisure and tourism in the countryside. This should not be at the expense of existing small-scale agricultural businesses which have been the bedrock of the region's economy for generations. Drainage from development would compromise the adjacent natural environment, namely the 'Glen' which is identified as a 'herb rich pasture'. Industrial/business development at the town entrance would not be attractive and the buildings would spoil the current fabulous view from the A7 on the approach to Hawick, of Ruberslaw and beyond. Prime arable ground should not be used for |

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| | | development. (212) |
| Growing your economy: Question 6 | BHAWI004 (Land to south of Burnhead), Hawick | SNH consider this is a prominent site that could have significant landscape and visual impacts with the potential for large or badly sited industrial units to sit awkwardly in the foreground of views of Rubers Law and the Southern Uplands, particularly in views approaching Hawick from the north on the A7. Adverse effects on landscape character could be exacerbated by the rolling nature of the site's topography which may provide difficulties for the siting of large buildings. Careful consideration of height and location of buildings would be required in order not to exacerbate adverse landscape effects. If allocated, SNH recommend that a strategic approach to development layout and landscape mitigation would be required. This should include its relationship with the adjacent preferred allocation at AHAWI027 and existing allocations BHAWI001 and BHAWI002 and should include requirements for: <ul style="list-style-type: none"> • Green infrastructure connections through the site, including links to housing at Burnfoot and the existing path network to the east of Burnhead Road. • Suitable densities of development on less sensitive parts of the site, avoiding the most elevated part to the east of Boorvaw Road. • Close attention should be paid to the existing settlement edge and to maintaining key views from the A707 and the B6359. (213) |
| Growing your economy: Question 6 | Business and Industry - Walkerburn | The contributor states that there is a need to allocate business and industrial land at Walkerburn. The settlement is in vital need of investment and is not that far from Peebles which is desperately short of business development opportunities. (155) |
| Growing your economy: Question 6 | Business and Industry - West Linton | The contributor considers that there is a definite requirement for Business and Industry land in West Linton for small business premises as well as offices. Premises for small contractors where they can obtain a small unit which provides an office space, secure storage space and secure lock fast premises for their van are also required. An area around Broomlee Camo on Station Road or along Boggsbank Road may be suitable, although it is noted that there are issues regarding the weight restriction on the bridge. (13 of 3) |
| Growing your economy: Question 6 | Business and Industry, West Linton | The contributor states that the only thing that is good is the lack of industrial units in West Linton which stops the final death knell of the village. The contributor also states that they are not sure that West Linton needs this type of development - it's a village, and despite there being some vocal lobbying for business units, the need is not there. (240) |
| Growing your economy: Question 6 | BWEST003 Deanfoot Road North, West Linton | The contributor objects to the allocation of this site BWEST003 Deanfoot Road North for Business and Industrial use. Whilst it is acknowledged that there had been discussions with the previous land owner, the site is now under new ownership. It is now intended that the land will be farmed and this site forms the main access onto the land. As a result the contributor states that they do not support the allocation of this site. (302) |
| Growing your | BWEST003 | The contributor recommends that a developer requirement is attached to the site to ensure that a |

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| economy: Question 6 | Deanfoot Road North, West Linton | <p>maintenance buffer strip of at least 6 metres wide is provided between the watercourse and built development. Additional water quality buffer strips may be recommended in addition to the maintenance buffer strip depending upon specific water quality pressures. There is a burn running through the site which should be protected and enhanced as part of any development. There should be no culverting for land gain.</p> <p>The contributor supports the development requirement for a Flood Risk Assessment (FRA) to be undertaken prior to development occurring on the site. The contributor states that a FRA which assesses the risk from the small watercourse (potentially called The Dean) which flows through the site. Consideration should be given to bridge and culvert structures which may exacerbate flood risk. Review of the surface water 1 in 200 year flood map and nearby steep topography indicates that there may be flooding issues within this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Site will need careful design to ensure there is no increase in flood risk elsewhere and proposed housing is not affected by surface runoff.</p> <p>The contributor states that the site has the potential for surface water flood risk and therefore recommends that this issue is taken forward through discussion with the flood prevention and roads department colleagues and Scottish Water, where relevant. It is noted that additional site specific information may only serve to identify that development at the site would be contrary to the SPP and the principles of sustainable flood management.</p> <p>All new developments should manage surface water through the use of Sustainable Urban Drainage Systems (SUDS). The contributor recommends that this requirement includes the use of SUDS at the construction phase in order that the risk of pollution during construction to the water environment is minimised.</p> <p>Foul must be connected to SW foul network. SW should confirm any capacity issues. There is a burn running through the site which should be protected and enhanced as part of any development. There may be a requirement for enhanced SUDS for any industrial uses. Depending on the use of the proposed units there may be a requirement for permissions to be sought for certain activities from SEPA. (119)</p> |
| Growing your economy: Question 6 | General | The contributor considers that mixed land use may be best. (151) |
| Growing your economy: Question 6 | General | The contributor welcomes any effort to bring sustainable business, and therefore employment, to rural areas, provided it does not unduly damage the environment and natural heritage. (152) |
| Growing your economy: Question 6 | General | The contributor believes business and housing should be separate. (168) |

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| Growing your economy: Question 6 | General | The Woodland Trust Scotland's (WTS) main concern is the impact on ancient woodland and ancient and veteran trees. The Trust cannot agree with many of the instances where it is required that boundary features should be retained 'where possible' because in some instances the Trust have identified ancient woodland, and also there could be ancient or veteran trees present around the site boundary; such features are irreplaceable and should be protected from adverse impacts of development. Scottish Planning Policy (SPP) states that ancient woodland and trees should be protected. The Trust suggest that the wording 'where possible' is replaced with 'where appropriate'. In instances where ancient woodland, and/or veteran or ancient trees have been identified these features must be retained and protected from adverse impacts of development. In all instances where additional planting is required, WTS would like to see planting with native tree species, appropriate to the site conditions, and sourced and grown in the UK. (199) |
| Growing your economy: Question 6 | General | The contributor doesn't disagree massively and states that the job situation is dire in the Borders. (203) |
| Growing your economy: Question 6 | General | The contributor strongly opposes the designation of mixed use land without there being a change to the powers of the Planning Authority to force the inclusion of business development. The track record in Tweeddale of SBC getting sensible and relevant business development on mixed use sites is poor. The housing developers are in practice not interested in this use of land and seem to go to a lot of trouble to work round the requirements. (206) |
| Growing your economy: Question 6 | General | The contributor questions why all the preferred and alternative options for mixed use land actually have codicils stating 'site must accommodate an element of business land' as if the designated areas are otherwise anticipating blanket residential development? This seems disingenuous. Mixed use designation sites that realistically will be almost entirely housing create heavy loads on schools, surgeries and road occupancy. What assessments of business/industrial land have been made to support the site designations? The contributor notes that unlike town centre occupation rates, there are no statistics for existing business/industrial land vacancy rates across the Borders. (209) |
| Growing your economy: Question 6 | General | Scottish Natural Heritage (SNH) note that without changes to some allocation boundaries, selection of alternatives and the delivery of development frameworks and briefs, it may be difficult to achieve the place-making and natural heritage objectives set out in the MIR. In this regard SNH strongly recommend that the Proposed Plan should adopt a clear format to address these matters and to demonstrate how it will address the policy principles for the planning system as set out in Scottish Planning Policy. Given the brevity of the site requirements provided in the MIR, SNH suggest that one role for the Proposed Plan will be to clearly set out what will be required of developers to ensure that their proposals secure and build on the assets of their locations. This could be achieved by including site development briefs for each of the allocations. SNH's comments on the preferred and alternative sites set out what these requirements may include in terms of natural heritage interests. (213) |

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| Growing your economy: Question 6 | General | The contributor considers that mixed use land will prevent over-industrialisation. (222) |
| Growing your economy: Question 6 | General | The contributor requires clarification on what 'additional business and industrial land/mixed use land' means? (231) |
| Growing your economy: Question 6 | General | If there is to be mixed use development, the contributor would like to see some real creativity and thought as to the visual environment for people - please engage some creative landscape architects to transform green spaces and lift spirits here and think about community engagement and what environments people want to live within. (243) |
| Growing your economy: Question 6 | General | The present plan would suburbanise the area. (247) |
| Growing your economy: Question 6 | General | The contributor is of the view that the provision of mixed use development reflects the poorest option of all with it being the least attractive and economically effective in all cases and should not be progressed. (252) |
| Growing your economy: Question 6 | General | The contributor is of the view that mixed use development is sensible. (258) |
| Growing your economy: Question 6 | General | The contributor notes that the transport infrastructure needs to be in place if businesses are to be encouraged to move into the area. (283) |
| Growing your economy: Question 6 | General | The contributor does not agree with the provision of additional business / industrial land by a proportion of mixed use / housing development land being made available for commercial use. Use of existing brownfield sites and the extension of existing industrial land must be the priority. There are few scenarios when land previously highlighted for housing should be suitable for industrial development. A possible alternative would be to consider more residential development in town centres to support their redevelopment and then reclassify housing land as commercial but don't feel that housing and commercial on the same site is a valid option. (289) |
| Growing your economy: Question 6 | General | Contributor 73 questions the need for additional employment land given that unemployment is already low and the working age population is forecast to decline. 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. (73) |

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| Growing your economy: Question 6 | General | The contributor states that market led developers prefer certainty and is not convinced that mixed use allocations deliver what is stated on the tin. (236) |
| Growing your economy: Question 6 | General - Selkirk | The Selkirk and District Community Council suggests there is still a need to plan for future strategic needs and encourage a vision of future growth for Selkirk. For example, approval of a defined line for a by-pass would provide a new coherent town boundary to the east and allow appropriate zoning and development for the future. (305) |
| Growing your economy: Question 6 | General – Galashiels / Hawick / Walkerburn | Borders towns such as Galashiels, Hawick and Walkerburn would benefit from increased business areas to bring greater life and vitality to them and to help stem the loss of residents and to reinvigorate these areas. (149) |
| Growing your economy: Question 6 | General - Peebles | Contributor 73 states that given the constraints around the requirement for a new bridge, LDP2 should not include any sites south of the River Tweed at Peebles for either housing or business and industry. Contributor 155 states that in areas such as Peebles where the infrastructure is creaking, development of business units should be promoted strongly elsewhere. Contributor 197 states that assuming that infrastructure, roads etc allow, then additional development next to eg Cavalry Park in Peebles for a limited number of units would minimise impact elsewhere. (73, 155, 197,) |
| Growing your economy: Question 6 | General – Tweedbank/ Lowood | Section 4.3 of the MIR makes reference to the Blueprint for the Border Railway and acknowledges that a Masterplan has been prepared for Tweedbank including the Lowood Estate site (the focus of the contributor’s interest as part of the wider “Tweedbank Site”) to the north of Tweedbank Railway Station. It states “the Lowood site offers a range of uses and has excellent development opportunities given its attractive setting, its proximity to the railway station and its location within an area with a proven housing market demand”. There is then reference to the initial ideas that have been prepared through the Masterplan and that they will be “developed further and involve extensive public consultation”. The reference to the Tweedbank site with regard to “excellent development opportunities” and being in an area “with a proven housing market demand” is misleading. A Report submitted to the Council by Jones Lang LaSalle Ltd (JLL) in response to the Tweedbank Masterplan highlights the housing market value and demand constraints that are present. Moreover, to some extent, the Ryden report fairly seems to indicate that the housing market at this location faces extremely challenging issues which are likely to be a serious barrier to future development especially when considered against the expected development costs and relatively low values driven by housing development at this location. The aforesaid JLL Report provides details which should be referred to with regard to the various constraints (in addition to the housing market issues) and two notable ones will be the need to be addressed adequately relate to protected habitats and |

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| | | the challenges with regard to the presence of functional flood plain. In addition, a fundamental point is the scale of development and its potential impact on the environment and how this is likely to be influenced by commercial viability matters. (92) |
| Growing your economy: Question 6 | General / Galashiels | The contributor contends that SBC should be proactive in developing the site in its possession in Galashiels instead of trying to market it for maximum profit. Set an example of creative urban development rather than leave it to developers to come forward with proposals which have already done much to spoil the centre of Galashiels. (23) |
| Growing your economy: Question 6 | MGALA007 (Easter Langlee III), Galashiels | The contributor considers that this site should be carried forward to be allocated for housing and renewable energy purposes (mixed use). There is little to no renewable energy allocations within the LDP2 and thus one requires to be more proactive in meeting renewable energy national, strategic and local planning policy guidance. It should be noted that the site plan submitted differs from that submitted at the Call for Sites stage in that the lower third of the site is now proposed for housing, rather than a renewable energy site as originally proposed. This proposal will therefore be assessed as a mixed use proposal under a new site code as the boundaries and uses proposed are different. (134) |
| Growing your economy: Question 6 | MLAMA001 Lamanha Mixed Use, Lamanha | The contributor seeks the allocation of site MLAMA001 for business or housing. (75) |
| Growing your economy: Question 6 | MLAUD002 Stow Road Mixed Use, Lauder | The contributor seeks the allocation of site MLAUD002 for industrial, residential or retail. At present the site is classified as agriculture use however, due to the fact that Lauder is expanding and encroaching towards the site, it is considered that the current use may not be appropriate. (304) |
| Growing your economy: Question 6 | MLAUD003 Whitlaw Road Mixed Use, Lauder | The contributor seeks the allocation of site MLAUD003 for industrial, residential or retail. At present the site is classified as agriculture use however, due to the fact that Lauder is expanding and encroaching towards the site, it is considered that the current use may not be appropriate. (304) |
| Growing your economy: Question 6 | MOXTO001 Oxtan South West, Oxtan | The contributor considers that this site has the potential for a new school, village hub including a shop and housing in the future. The southern part of the site has been supported by the majority of the community. There is a will that if Oxtan and Channelkirk is to expand and develop to this extent that they should facilitate, support and pursue the following: <ul style="list-style-type: none"> • School/Hall/Shop – (Can we consider and re-look at a ‘Hub’ accommodating these within one facility?) • We must use the opportunity to secure developer contributions to go into a pool to help protect the school in the future by way of upgrading existing or providing a deposit towards a new one • Utilities – Gas and Broadband can we negotiate with suppliers’ new opportunities (Would the |

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| | | <p>utilities cope with the increased demand this volume of housing and people would place on them?)</p> <ul style="list-style-type: none"> Roads & Paths - must be reviewed and developed to incorporate the future development and enhance the existing paths, pavements, roads and lighting. <p>(328)</p> |
| Growing your economy: Question 6 | MSELK002 (Heather Mill), Selkirk | Welcome the retention and continued allocation of MSELK002 as a mixed use site within LDP2. (56) |
| Growing your economy: Question 6 | MSELK002 (Heather Mill), MSELK003 (Land west of Heather Mill), MSELK004 (Land and buildings at Whinfield Mill), Selkirk | Request that MSELK002, MSELK003 and MSELK004 are allocated as mixed use development opportunities with a specific redevelopment opportunity with scope for redevelopment for a range of mixed uses, including residential development. None of the existing mill buildings are in active use and have been vacant and derelict for a number of years. (56) |
| Growing your economy: Question 6 | MSELK003 (Land west of Heather Mill), Selkirk | The site is currently allocated within the LDP 2016 for business and industrial use as part of BSELK003 (Riverside 8) in Selkirk. This site would be subject to Policy ED1 which contains a general presumption in favour of business and industrial uses, but also allows scope for mixed uses. The contributor considers that the site has the potential to be redeveloped for a range of mixed uses including residential, nursing home, tourism, office, retail, leisure and commercial uses. The redevelopment of this site for a range of higher value land uses would contribute to the objectives of sustainable economic growth and would allow the redevelopment of currently vacant and derelict land for a high quality, sustainable development in an accessible and sustainable location. The contributor would be agreeable to any requirement for a Planning Brief to be undertaken for the site. The recently completed Flood Protection Scheme has removed any flood risk at the site. The contributor therefore requests that the site is allocated within the LDP2 as a mixed use development opportunity. (56) |
| Growing your economy: Question 6 | MSELK004 (Land and buildings at Whinfield Mill), Selkirk | The site is currently allocated partly under BSELK001 (Riverside 7) and zEL11 (Riverside 2) in Selkirk. This site would be subject to Policy ED1 which contains a general presumption in favour of business and industrial uses, but also allows scope for mixed uses. The contributor considers that the site has the potential to be redeveloped for a range of mixed uses including residential, nursing home, tourism, office, retail, leisure and commercial uses. The redevelopment of this site for a range of higher value land uses would contribute to the objectives of sustainable economic growth and would allow the redevelopment of currently vacant and derelict land for a high quality, sustainable development in an accessible and sustainable location. The recently completed Flood Protection Scheme has removed any flood risk at the |

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| | | site. The contributor would be agreeable to any requirement for a Planning Brief to be undertaken for the site. The contributor therefore requests that the site is allocated within the LDP2 as a mixed use development opportunity. (56) |
| Growing your economy: Question 6 | Potential for Business within Glentress Tourist Asset | Tourism sites such as Glentress could host a small number of related industries or retail outlets which could be beneficial to the attraction and minimise the visual downsides of industrial parks dotting the countryside whilst answering the need for economic development. (197) |
| Growing your economy: Question 6 | Safeguarding sites for Employment and Economic Purposes - Peebles | The contributor states that there are various business sites within Peebles that are located in areas of 'white land' within the LDP settlement map. This allows owners of these sites to make an application for housing development rather than preserve the site for employment / business use. To prevent the future loss of such sites, it is considered that these sites should be identified and safeguarded within LDP2. Whilst the following list is not exhaustive, it is considered that the following sites should be included: Crossburn Caravan Park, Edinburgh Road Harrison's Garage, Edinburgh Road Holland and Sherry, Dean Park Sainsbury's, Northgate Tesco, Dovecote Road Garage, St Andrew's Road Haylodge Hospital, Neidpath Road Dalgleish Garage, Old Town Hydro Hotel, Innerleithen Road The Park Hotel, Eastgate Tontine Hotel, High Street Harbro, South Parks Southpark Garage, South Park Tweeddale Motors, Innerleithen Road Travis Perkins and other units, Dovecote Road Garages at George Street and North Place Brown Bros Garage, Edinburgh Road George Tait's Yard, George Street The remainder of Rosetta Caravan Park, Rosetta Road Peebles Auction House, Old Church Road Various units in Cavalry Park, Kingsmeadows Road. (318) |
| Growing your economy: | SCARD002 Land at | The contributor states that the identification of site SCARD002 seems a surprising choice for economic land allocation, and they cannot see the logic other than it is adjacent the road. (24) |

Question 6 – Growing Your Economy

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| Question 6 | Nether Horsburgh, Cardrona | |
| Growing your economy: Question 6 | SCARD002 Land at Nether Horsburgh, Cardrona | <p>Contributor 30 considers that this long term proposal will damage the setting of the existing village of Cardrona which is now fitting well into the landscape. It is considered that the proposal will add almost 200 additional houses to the village and these new residents will surely need to shop in Peebles. It is considered illogical and appalling to consider re-routing the A72 through the site.</p> <p>Contributor 159 states that the identification of this site does not take into account the applications for houses on the south side of the A72 - 14/00666/FUL and 18/01289/FUL. They consider that it seems daft to re-route the A72 through the proposed development. In addition, Cardrona is a dormitory housing estate rather than a village with a community spirit. It has a shop/cafe of sorts (currently threatened by the houses being built cheek-by-jowl beside it), a limited village hall and that's it. Several people there would rather be in Peebles where the facilities are. When creating new housing areas please ensure they have appropriate facilities.</p> <p>Contributor 206 states that this site epitomizes the problem with mixed use. There is still a site behind Horsbrugh Cottages on the access to the MacDonald Hotel that is designated for business use and never developed. Why do we need more designation in SCARD002? If this is designated for mixed use without powers of compel the business developments then it will just end up as housing.</p> <p>Contributor 243 states that there will be increased traffic on the adjacent main road exacerbated by this proposal which will impact on safety for all people using the area. The contributor also questions the need for more community infrastructure.</p> <p>Contributor 249 states that the people of Cardrona do not want to live in a town, they chose a village. Don't force a town on them.</p> <p>Contributor 276 states that this site will result in an increased volume of traffic on an already busy road.</p> <p>Contributor 283 states that they disagree with the identification of this site. While this may have the advantage of being a large flat site it is highly visible. It is also home to the Peebles Agricultural Show and the contributor understands that there are further plans for the landowners (Forestry Commission) to expand its use for events. Consequently this site is invaluable as a major event arena for the area.</p> <p>Contributor 308 states that this site is considerably more visible from the A72 than their proposed site - ACARD002 West of B7062.</p> |

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| | | (30, 159, 206, 243, 249, 276, 308) |
| Growing your economy: Question 6 | SCARD002 Land at Nether Horsburgh, Cardrona | The contributor states that this development will destroy good agricultural land and create in effect a new settlement separated by a road or the Tweed. This creation of a separate development will create a lot of extra traffic as people will inevitably drive to Peebles for various services. 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. In addition 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. (46) |
| Growing your economy: Question 6 | SCARD002 Land at Nether Horsburgh, Cardrona | The contributor states that development of this site would cause the destruction of ancient pasture; increases the risk of pollution to the River Tweed and its tributary; will affect local wildlife and tourism; it may cause damage to the historic sites including a history of arboriculture, buildings and artefacts close to the access road. In addition, development at this location would be highly visible and result in spoiling the view for visitors and tourists alike. The increase in population will result in further stretching existing services and facilities. The area does not need and should not be forced to have an increase in population. The proposal will result in making the area a commuter area with no facilities nearby, increasing our carbon footprint. The A72 is already busy and fast, it is frequently closed due to accidents, and is narrow in places, causing bottlenecks and risking lives if emergency services need to get through. Further development along the A72 will result in increasing the number of accidents particularly with cyclists. There is no alternative route. It is also vulnerable to flooding and risk of erosion by the Tweed, development on agricultural land will exacerbate flooding. The creation of Cardrona village has resulted in a village with little community spirit, and is a dormitory village with few facilities, enlarging it will exacerbate its existing problems. The development on agricultural land used for food production is unwise and may impact on food security. (108 (1 of 2)) |
| Growing your economy: Question 6 | SCARD002 Land at Nether Horsburgh, Cardrona | The contributor states that it is not unreasonable to assume that approximately 200 or more houses would be earmarked for this site. Development of this nature in such a scenic location is unthinkable. This is clearly a very rural location, nestling in the valley bottom surrounded by hills and forest and lies in the Special Landscape Area (SLA). Current policy (EP5) requires that such areas are afforded adequate protection against inappropriate development and that potential maintenance and enhancement are provided for; clearly the proposals for this development are utterly inappropriate. It would be wrong to consider that the social or economic benefits outweigh the need to protect this special environment. It is noted that there is the possibility of re-routing the A72 through this site. This idea seems to come from the consultation report by LUC on behalf of SBC. This report suggests that the A72 could be re-routed and combined with a new High Street or village centre serving Cardrona. This suggestion is ridiculous and the prospect of diverting the A72 equally ridiculous; the contributor states that they do not need a new town at Nether Horsburgh. Over the past few years this site has been used by the Peebles Agricultural Society as the site for the annual agricultural show. The site is ideally located for such use and has gone from strength to strength since established there. As is well known locally, there are no other suitable sites for |

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| | | holding such an important show or any other show of the size and nature of this one. Officers should be aware that such shows are at the centre of rural life and essential for the local economy. If Peebles is to retain its character as a rural town then it needs the proper space to hold events of this nature. It is quite conceivable that this site could be made more permanent and used to facilitate a variety of shows and events much in the same way that the Springwood Showground in Kelso has been developed to host many different types of events. (318) |
| Growing your economy: Question 6 | SCARD002 Land at Nether Horsburgh, Cardrona | The contributor states that the allocation of land to the north of Cardrona has not fully proven to be in line within the associated SEA criterion or be deliverable in the short to medium term. It is noted that SNH considers the site to be exposed in the landscape and with no strong relations to the existing village. It is believed that the development of this site would have a far more significant impact on the Landscape than the contributors promoted site - ACARD003. (117) |
| Growing your economy: Question 6 | SCARD002 Land at Nether Horsburgh, Cardrona | <p>The contributor recommends that a developer requirement is attached to the site to ensure that a maintenance buffer strip of at least 6 metres wide is provided between the watercourse and built development. Additional water quality buffer strips may be recommended in addition to the maintenance buffer strip depending upon specific water quality pressures. The small watercourses running through/alongside the development should be safeguarded and enhanced as part of any development. The contributor supports the development requirement for a Flood Risk Assessment (FRA) to be undertaken prior to development occurring on the site. The contributor states that a FRA which assesses the risk from the small watercourses which flow through and adjacent to the site as well as the River Tweed. Consideration will need to be given to bridge and culvert structures within and adjacent to the site which may exacerbate flood risk. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Site may be constrained due to flood risk.</p> <p>The contributor states that the site has the potential for surface water flood risk and therefore recommends that this issue is taken forward through discussion with the flood prevention and roads department colleagues and Scottish Water, where relevant. It is noted that additional site specific information may only serve to identify that development at the site would be contrary to the SPP and the principles of sustainable flood management.</p> <p>All new developments should manage surface water through the use of Sustainable Urban Drainage Systems (SUDS). The contributor recommends that this requirement includes the use of SUDS at the construction phase in order that the risk of pollution during construction to the water environment is minimised.</p> <p>Foul drainage should be connected to the SW foul network at Cardrona sewage treatment works (the site is outwith the currently sewered area). Options for private drainage on site do not appear to be feasible. The small watercourses running through/alongside the development should be safeguarded and enhanced as part of any development. Depending on the use of any proposed units there may be a requirement for permissions to be sought for certain activities from SEPA. (119)</p> |

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| <p>Growing your economy: Question 6</p> | <p>SCARD002 Land at Nether Horsburgh, Cardrona</p> | <p>The contributor states that the allocation of this site has the potential for setting impacts on scheduled monument - Nether Horsburgh Castle. They consider that there is potential for development of this site, and welcome that the SEA sets out adherence to LDP policy EP8 as a mitigation measure, and that this has been brought forward to the site requirements, but recommend that specific reference to the scheduled monument is included here. They also note that there may be consideration of re-routing the A72 through the site, and would expect any such proposal to be considered in terms of Policy EP8 and national policy on scheduled monuments. Furthermore they note that a masterplan would be required for the site, and recommend early consultation with Historic Environment Scotland on the development of any masterplan that may emerge. (164)</p> |
| <p>Growing your economy: Question 6</p> | <p>SCARD002 Land at Nether Horsburgh, Cardrona</p> | <p>The contributor states that the site lies outwith the current settlement boundary as shown in the LDP and is within a Special Landscape Area. Due to its physical separation there is little relationship of this site to Cardrona or to Peebles and it appears likely that development here would essentially involve the creation of another standalone housing area. Due to the prominence and location of this site we advise there is a high potential for adverse landscape and visual impacts within the SLA, even with mitigation. The overall assessment in Appendix 10 of the Housing SG was that the site is unacceptable due to high potential for adverse landscape and visual impacts and the need for a solution to access issues. The MIR proposes that the A72 could be re-routed through the site, with SEA site assessments noting that this section should function as a street.</p> <p>The contributor states that they are not aware that effective mitigation has been identified to address landscape impacts and maintain our previous advice regarding the physical separation of this allocation and its potential landscape and visual impacts. They consider that there are other allocations in the Tweeddale Locality that could supply required housing numbers and which would not have adverse landscape and visual impacts. If this site was to be safeguarded as a long term option the contributor states that they would strongly advocate that the placemaking issues are addressed in advance, with clear site briefing required to mitigate landscape impacts and successfully integrate development within the context of the A72 trunk road. (213)</p> |
| <p>Growing your economy: Question 6</p> | <p>SPEEB005 Peebles East (South of the River) (Sites MPEEB004 and MPEEB008 also referenced in submission),</p> | <p>The contributor objects to the preferred options for housing and mixed-use sites within/around Peebles. Specifically, that the site has not been identified as a preferred mixed use site.</p> <p>The contributor also states that the current arrangement in the MIR could effectively result in the removal of their site's safeguarded status as a potential longer term mixed-use site within the LDP1.</p> <p>It is considered that solutions exist to the technical constraints outlined by SBC and therefore the site should be considered effective now, and ready to come forward for development within the lifetime of LDP2. In addition there is no requirement for a new bridge, and that development at this location will not have a major impact on biodiversity. In relation to flood risk it is considered that a flood mitigation solution is feasible and workable. In respect to landscape, it is considered that the proposed development of the site would not result in adverse impacts to the surrounding landscape character.</p> <p>It is noted that there is currently a live planning application on the site.</p> |

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| | Peebles | <p>The contributor has submitted an Indicative Masterplan for the site, Flood Risk Assessment and Flood Mitigation Strategy, a Transport Technical Note and an Ecological Technical Response.</p> <p>The contributor states that the site is being promoted by AWG and Taylor Wimpey, with the latter having a proven track record of delivering, and selling housing in Peebles and that this should be recognised. In addition the contributor recommends that the Council should increase the provision of housing sites on effective land, and where developers have identified as a place where people want to live and where they wish to build such as this site.</p> <p>The contributor state that they agree with SBC's position that the site could be allocated for mixed use development. The Indicative Masterplan outlines that alongside residential development, land of a sizable area (over 1ha) has been safeguarded for the purposes of employment uses within a dedicated business/employment centre.</p> <p>The principle of residential development on the site has already been established through its inclusion as a 'safeguarded' longer-term mixed use site within the adopted LDP1.</p> <p>In addition, the contributor states that there are clear constraints in bringing forward the preferred sites identified in Peebles and therefore this site should come forward. (111)</p> |
| Growing your economy: Question 6 | SPEEB008 Land West of Edderston Ridge, Peebles | <p>The contributors support the inclusion of SPEEB008 for Longer Term Mixed Use.</p> <p>Contributor 101 also states that they have the ability through further planting and the pattern of development to shape this edge to Peebles, providing a significant area of land for future phased development alongside a long-term defensible boundary to the town. In addition they state that they acknowledge that certainty is required with regards to the requirement for and delivery of a new crossing over the River Tweed and are willing to work with the Scottish Borders Council in better understanding this requirement and helping with its delivery if at all possible. The contributor also states that they own further land to the west and south of this site and so can provide additional or alternative sites for the provision of new homes and business land.</p> <p>Contributor 309 states that they have no objection to the land being included in the next LDP. (6 (1 of 2), 101, 309)</p> |
| Growing your economy: Question 6 | SPEEB008 Land West of Edderston Ridge, Peebles | <p>The contributor objects to the inclusion of site SPEEB008 for Longer Term Mixed Use primarily due to the lack of capacity for additional traffic to negotiate Caledonian Road and South Parks Road as recognised by the Council, additional development if it came forward would result in exacerbating the existing situation leading to further congestion and a corresponding increase in risk to pedestrians, cyclists and other road users. It is noted that even if a new bridge did come forward, it would not impact in any way positively or negatively on the Caledonian Road or South Parks road situation. This would result in impacting on existing residents as well as on the Fire and Ambulance stations due to delay caused by congestion. The contributor states that there has been no Transport Assessment undertaken for any of the sites or one produced to consider the implications of joint developments. It is noted that existing</p> |

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| | | historical documentation from 2012, 2013 and 2014 consider that further development in South Parks be stopped due to restrictions imposed by the nature of Caledonian Road. The contributor has noted the current position of the roads leading to the site. (25 (1 of 2)) |
| Growing your economy: Question 6 | SPEEB008 Land West of Edderston Ridge, Peebles | <p>The contributors state that the traffic on the narrow Caledonian Road that is already predicted to be busy with the south parks and the Tweedbridge Court developments. The Caledonian Road cannot possibly take the traffic that would be generated by 200/288 additional houses. Furthermore if the site to the west of Harbro is developed for housing it would amount to some additional 150 houses allowing for the woodland planting therefore totalling 350 houses. A second bridge is not going to help this situation. The site is also located on the edge of the National Scenic Area and is also part of the Special Landscape Area. Therefore the scale of the proposed development would detract from and diminish these areas. It also eats up yet more agricultural land, and will impact on the beautiful countryside. In addition 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.</p> <p>Contributor 111 and 114 states that there are clear constraints that would compromise the effectiveness and delivery of this site, namely the issues around landscape, roads and the River Tweed SSSI/SAC (although they state that this is presumably manageable).</p> <p>Contributor 127 states that the site has its challenges which cannot be seen to be overcome during the plan period. These will ultimately render the site ineffective.</p> <p>Contributor 181 states that they do not agree with such a large area of land allocated for housing at the South Park site as this entails residents driving over Tweed Bridge to access amenities and main routes to Edinburgh and Galashiels.</p> <p>Contributor 206 states that albeit longer term, this site epitomizes the problem of mixed use. There is a site already identified for business use at South Parks on the west of the current business estate. But whilst it is apparently offered for sale this has not been taken up (perhaps because business use is of little commercial interest). The Northern section of SPEEB008 - adjacent to the current South Parks business site - should be designated for business use only. SBC will need to solve the roads problem in respect of commercial/industrial vehicles getting along Caledonian Road.</p> <p>The larger Southern section of SPEEB008 adjacent to Edderston Road and Edderston Ridge could be designated for housing only if at all. The contributor questions the reasoning for further housing development.</p> <p>Contributor 270 states that they do not agree with the identification of this site. The access road is unsuitable for more traffic and the local schools, doctors and dentist are already under too much pressure.</p> |

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| | | The contributor states that mixed use is not appropriate for the site, due to the narrow access roads. (30, 46,111, 114, 127 (1 of 3), 181, 206, 222, 270, 273) |
| Growing your economy: Question 6 | SPEEB008 Land West of Edderston Ridge, Peebles | <p>The contributor objects to the identification of site SPEEB008 within the MIR. They state that there are issues with Caledonian Road and that it does not meet current standards for the existing number of houses that it serves or for the proposed sites within the current LDP that are subject to planning application i.e. South Parks and Tweedbridge Court.</p> <p>Uses associated with the industrial estate have also resulted in impacting on Caledonian Road and on South Parks, and there appears to be no restrictions on the businesses that can be introduced at the industrial estate.</p> <p>The Tweed Bridge has exceeded its capacity at AM and PM times. There have been numerous statements made that the south side of the Tweed could not be developed, development still occurs.</p> <p>The contributor also raises issue with a number of the proposed site requirements set out in the MIR, in that the MIR states that the site should respect the existing built form and landscape design; that the new development must integrate and connect with the existing housing to the east, the contributor states that this is not possible; the requirement for a Transport Assessment does not give any confidence as SBC Roads Planning have displayed a lack of impartiality; a second river crossing will not alleviate the bottleneck of Caledonian Road. Caledonian Road does not comply with minimum requirements for visibility and design of footpaths and cannot be modified.</p> <p>It is considered that the proposed development that is estimated to be in the range of 450 units will gridlock the existing roads. (80)</p> |
| Growing your economy: Question 6 | SPEEB008 Land West of Edderston Ridge, Peebles | <p>The contributor states that development of this site would cause the destruction of ancient pasture; increases the risk of pollution to the River Tweed and its tributary; will affect local wildlife and tourism; building has already taken place in the area, which will speed run-off during heavy rain, putting the area downstream at higher risk of flooding. Traffic from the proposed development will have to access the area via a junction that is already difficult and dangerous, and have to use a bridge that is already vulnerable. This area already sees frequent traffic jams – as the emergency services also need to use this road makes this area highly unsuitable for further development. The topography of Peebles and its environs mean the town and its transport links are very vulnerable. The B7062 is not suitable for large vehicles and in places is barely wide enough for two cars. The A703 is still only a double track road that can be very fast and as the main route out of the Borders is very busy. The A72 is already busy and fast, it is frequently closed due to accidents, is narrow in places, causing bottlenecks and risking lives if emergency services need to get through. There is no alternative route. It is also vulnerable to flooding and risk of erosion by the Tweed, and development on agricultural land will exacerbate flooding. With the rise in the number of users on the A72 there will be an increase in the number of accidents particularly with cyclists. With the increase in population in the area, it will result in further stretching existing services and facilities including education. The proposal will also result in an increase in the number of houses, businesses and</p> |

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| | | their occupants doing more journeys to get to work, shops, etc as there are limited facilities in the area thereby increasing our carbon footprint. The development on agricultural land used for food production is unwise and may impact on food security. (108 (2 of 2)) |
| Growing your economy: Question 6 | SPEEB008 Land West of Edderston Ridge, Peebles | The contributor states that this site of 19.5HA is earmarked for mixed use in the long term and is shown to be a preferred site. Site capacity is to be allocated but it would not be unreasonable given the size of it to assume that the housing capacity will be well in excess of 200 houses. The Caledonian Road, which is the only access to both of these sites, is unsuitable to sustain the level of traffic envisaged. It is impossible to imagine that this old Victorian street, could sustain the level of traffic for the existing application let alone the numbers likely to be proposed for this new site. There have been calls for a full and truly independent traffic survey to be conducted on this street to establish accurate levels of capacity and sustainability. The lack of capacity for this busy road has been acknowledged in a number of documents including Reporters Reports. This site is located on the edge of a National Scenic Area and is part of the Special Landscape Area. The scale of the proposed development would detract from and diminish these areas. This site is utterly unsuitable for the type of development proposed and should be rejected. (318) |
| Growing your economy: Question 6 | SPEEB008 Land West of Edderston Ridge, Peebles | The contributor states that they agree with the development of this site but there is a need for improved transport links. The site would suit a mix of business and housing. (283) |
| Growing your economy: Question 6 | SPEEB008 Land West of Edderston Ridge, Peebles | The contributor recommends that a developer requirement is attached to the site to ensure that a maintenance buffer strip of at least 6 metres wide is provided between the watercourse and built development. Additional water quality buffer strips may be recommended in addition to the maintenance buffer strip depending upon specific water quality pressures. The burns running through/adjacent to the site must be protected and enhanced as part of any development. The contributor supports the development requirement for a Flood Risk Assessment (FRA) to be undertaken prior to development occurring on the site. The contributor states that a FRA which assesses the risk from the Edderston Burn and tributaries which flow through and adjacent to the site. Consideration will need to be given to bridge and culvert structures within and adjacent to the site. The applicant would need to be mindful of the FPS to ensure there is no increase in risk elsewhere. There have been discussions regarding additional flood prevention works here which may restrict development. Due to steep topography through the allocation site, consideration should be given to surface runoff issues to ensure adequate mitigation is implemented. Site will need careful design to ensure there is no increase in flood risk elsewhere and proposed housing is not affected by surface runoff. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within this site. This should be investigated further as and it is recommended that contact is made with the flood prevention officer. Discussions should also take place with the flood prevention officer regarding the additional flood protection works that are considered in the future to ensure a holistic approach. |

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| | | <p>All new developments should manage surface water through the use of Sustainable Urban Drainage Systems (SUDS). The contributor recommends that this requirement includes the use of SUDS at the construction phase in order that the risk of pollution during construction to the water environment is minimised.</p> <p>Foul drainage from the development must be connected to the existing SW foul sewer network. The burns running through/adjacent of the site must be protected and enhanced as part of any development. Depending on the use of the proposed units there may be a requirement for permissions to be sought for certain activities from SEPA. (119)</p> |
| Growing your economy: Question 6 | SPEEB008 Land West of Edderston Ridge, Peebles | The contributor notes that the site requirements for development of this site include a new river crossing. Development of proposals for a new crossing should avoid negative effects on the setting of the category 'A' listed Neidpath Castle. Early consultation with Historic Environment Scotland is advised if impacts on the setting of Neidpath Castle are likely. (164) |
| Growing your economy: Question 6 | SPEEB008 Land West of Edderston Ridge, Peebles | <p>The contributor states that this site is partly within the Upper Tweeddale National Scenic Area (NSA). While this presents challenges, in this specific context we consider that potential impacts could be addressed in site requirements. The western part of the site, which is within the NSA, benefits from existing strong boundaries created by drystone dykes, hedges and individual trees. These features should be retained and form a key part of the structure/layout of development throughout this site, maintaining the quality of place within and adjacent to the NSA. They therefore recommend that the site requirement is amended from "Protect existing boundary features, where possible" to "Protect and integrate existing boundary features within the overall placemaking approach". The MIR site requirements state that a masterplan is to be prepared. In addition to the retention of boundary features the contributor recommends that the masterplan should be directed to include:</p> <ul style="list-style-type: none"> • Green networks through the site which integrate SUDS and active travel infrastructure, this should include providing links through the site to the nearby school. • Recreational links, for example to Manor Sware viewpoint and the River Tweed should be retained or re-established in appropriate form. <p>In addition, site requirements in the LDP should clearly set out a requirement for Habitats Regulations Appraisal at application stage due to the site's proximity to the River Tweed SAC. (213)</p> |
| Growing your economy: Question 6 | SPEEB008 Land West of Edderston Ridge, Peebles | The contributor recommends that the Council works in partnership with the Tweed Forum to devise the best mitigation solutions regarding their concerns to trees. (199) |

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| <p>Growing your economy: Question 6</p> | <p>Tweeddale Additional Allocations</p> | <p>Contributor 145 states that they do not agree with the allocation of land at Eshiels, Cardrona and Peebles. The local communities transport and utility infrastructure are unable to cope with current demand. Additional business and industrial allocations will exacerbate these capacity issues including additional traffic joining the already heavily used A72 increasing the likelihood of traffic accidents.</p> <p>Contributor 154 states that they object to further proposals for more urban development in the Tweed Valley around Glentress. The approach from the south has already been spoiled by the new housing and an unattractive hotel - both of which are completely out of character for their setting.</p> <p>Contributor 193 states that they disagree with the additional allocations as the area is a Special Landscape Area, the proposed development is out of scale and out of character, and it will impact on the areas potential for tourism as well as ruin local biodiversity.</p> <p>Contributor 276 states that with regard to the preferred options at Peebles and Eshiels, the contributor does not agree with them as whilst more housing is planned for Peebles in current plan never mind this MIR, the lack of suitable industrial sites for business development mean no improvement in local employment. SME's springing up in small units like at Calvary park whilst they make a contribution, numerically they are insignificant. The contributor considers that the area has become a dormitory suburb of Edinburgh. Trying to ameliorate this now by suggesting a mixed use conurbation in Eshiels is absurd. The urbanisation, apart from biodiversity impact, will change the experience for 300,000 visitors to Glentress alone never mind the other mountain bike trails. The plan talks of the importance of the open and sweeping scenic vistas. The developments take the form of ribbon development which is prohibited. With regards to Eshiels there will also be an issue in relation to drainage from the proposed development which may contribute negatively to the flow of the Tweed. (145, 154, 193, 276)</p> |
| <p>Growing your economy: Question 6</p> | <p>Tweeddale Mixed Use Sites</p> | <p>There are no alternative sites identified. The sites identified are broadly suitable for high quality business development, but sites described as mixed use seem to be scheduled largely for housing. Also the proportions of those sites not designated for housing must be protected against housing development in perpetuity (96)</p> |
| <p>Growing your economy: Question 6</p> | <p>Tweeddale Mixed Use sites</p> | <p>The contributor states that in relation to land for employment use, the SESplan seeks to ensure that there is a sufficient supply of land for employment use; the SESplan also goes on to state that the sufficiency of land supply would take account of market demand and infrastructure. Apart from some quite perfunctory comment regarding each specific site, there is no separate assessment of demand nor of existing infrastructure if each of these sites were to be included within the LDP and subsequently developed. In addition, the contributor states that with regards to Peebles and the surrounding area, they do not agree with the preferred options discussed. (318)</p> |
| <p>Growing your</p> | <p>MINNE003</p> | <p>The contributor objects to the inclusion of MINNE003 as a preferred mixed use site. (17, 67, 119, 162,</p> |

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| <p>economy: Question 6</p> | <p>Land West of Innerleithen, Innerleithen</p> | <p>183, 206, 213, 225, 275)</p> <p>The contributor states that part of the site has been previously rejected for inclusion in the current Local Plan on the grounds that the site was inappropriate for major development. (67)</p> <p>The contributor feels that development of the site will have a detrimental impact on existing neighbouring residential streets. (275)</p> <p>The contributor highlights the Health & Safety concern regarding traffic flows through a quiet residential cul-de-sac at Tweed View onto the very busy A72 main arterial road, or through a quiet residential sector made up primarily of elderly residents within an affordable homes allocated area, onto Traquair Road. (67)</p> <p>The contributor states that additional traffic to the site due to mixed use allocation may cause an increase in traffic, noise and pollution, to the detriment of the existing community. (17)</p> <p>The contributor highlights that existing access to A72 from Tweed View is currently dangerous and sub-standard. An increase in traffic using this junction will make it even more. (67, 225, 275)</p> <p>The contributor states that the existing narrow access cannot be made wider. (17)</p> <p>The contributor is concerned about the impact the allocation would have on the Health Centre. (17)</p> <p>The contributor raises concerns over the capacity of the existing Innerleithen health care centre and its ability to accommodate further patients as a result of this site allocation. (67, 225, 275)</p> <p>The contributor states that development of this site would have a detrimental impact on the views from the Health Centre. (67, 183)</p> <p>The contributor raises concerns about the impact development of the site may have on St Ronan's Primary School. (17, 225, 275)</p> <p>The contributor feels the proposal will breach the Scottish Government's "Designing Streets" guidelines as it would be mixing industrial and housing developments together. The contributor highlights how "Designing Streets" talks about the need for connectivity and safer layouts with an emphasis on visual quality. (67)</p> <p>The contributor strongly opposes the designation of mixed use without there being a change to the powers</p> |
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| | <p>of the planning authority to force the inclusion of business developments. Housing developers are in practice not interested in this use of land and seem to go to a lot of trouble to work round the requirements. The contributor suggests the proposed site could be a very attractive site for just housing due to its south facing outlook and doubts it is appropriate for business. However there is a need for business sites in Innerleithen. (206)</p> <p>The contributor states they are not against sensible, sustainable and organic development based on proven need, however there is no evidence that there is need for new industry, housing and jobs in the Innerleithen area. (67)</p> <p>The contributor states there is no identified need for new housing in Innerleithen. (183, 225)</p> <p>The contributor suggests there are many gap sites in the area that should be filled before major development is undertaken. (275)</p> <p>The contributor states the proposed site is effectively the last bit of green space in the town that is on the level and easily accessible to all for walking. (17)</p> <p>The contributor fears the proposal will result in the loss of valued greenspace used by community for events throughout the year. (17, 67, 162)</p> <p>The contributor notes that rather than developing the entire field, any development should be kept small and in line, west of Tweed View and not in front of it. (67)</p> <p>The contributor states that the proposal will adversely affect the environment by increasing the number of boilers and volume of exhaust fumes from the additional vehicles the development will bring, which contradicts environmental policy for sustainability and traffic policy for efficient road use. We need to encourage less travel for commutes not encourage more. (67)</p> <p>The contributor raises concerns as to whether the sewage system has capacity to cope with increased population. (225)</p> <p>The contributor states Innerleithen doesn't have a sewage works and so all this new effluent will have to be transported. Any upgrade to the system will cause major disruption to existing infrastructure. (67)</p> <p>The contributor notes the proposed site has been subject to flooding in previous years. (67, 225)</p> |
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| | | <p>The contributor states that there may be flooding issues within the site. Surface water runoff from the nearby hills may be an issue and may require mitigation measures during design stage. (119)</p> <p>The contributor notes that if the water table from the River Tweed were to rise further in the future it could impact any potential development on the site. Large-scale development on the narrow stretch of water could result in effluent or other chemical waste accidentally entering the river ecosystem. (67)</p> <p>The contributor highlights that site encompasses an historic Roman site which is of great significance to the area. (162, 183)</p> <p>The contributor states that the site is adjacent to the Tweed Valley Railway Path, a huge local asset with its scenic views and attraction to path users. Wider scenic views to the hills beyond will be lost forever should this site be developed when approaching Innerleithen from the west. (183)</p> <p>The contributor states that development on this site would be dominant in views towards the surrounding hills from the A72 both on arrival to and departure from Innerleithen. To minimise impacts on the attractive landscape setting of the village and the wider appreciation of the Tweed Valley Special Landscape Area, the contributor suggests part-allocation with the site boundary aligned to Tweed View to help reduce impacts by avoiding the introduction of development as a dominant element in open views. Key to reducing landscape impacts will be a high quality designed edge to any potential development, perhaps including tight co-ordination of building frontage, the consideration of views, avenue planting and a multi-user path set back from the road edge. Any proposed allocation of this site should secure links through the proposed site to connect with the Innerleithen-Peebles path. (213)</p> |
| <p>Growing your economy: Question 6</p> | <p>MINNE003 Land West of Innerleithen, Innerleithen</p> | <p>The contributor supports the allocation of MINNE003 as a preferred mixed use option. (91, 118 (2 of 2), 133, 283)</p> <p>The contributor states Innerleithen is an increasingly popular place in which to live, mainly due to its countryside setting, combined with recreational opportunities and excellent public transport links to both Edinburgh and the central Borders. It is important that land allocations are made in sustainable and sought after locations. The location of the site would allow a natural extension to the Innerleithen development boundary. The contributor suggests the site is capable of achieving significantly in excess of 50 units, even allowing for low density housing at the settlement edge, open space and robust structure planting in order to minimise impact upon the Tweed Valley SLA. (91)</p> <p>The contributor feels the site is more than capable of accommodating up to 125 dwellings as well as an extension to the Health Centre and some provision for business units. Scottish Water's Walkerburn waste water treatment works are understood to have sufficient capacity as have the water treatment works.</p> |

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| | | <p>Allocation of the site will make a positive contribution towards meeting the housing land requirement within the next Local Development Plan for Tweeddale. There is evidence of developer and consumer demand within Innerleithen. The site is in a highly accessible and sustainable location and it is capable of being delivered within the 5 year Local Development Plan lifespan. Mitigation of landscape impact and containment can be achieved through the Masterplan process.</p> <p>The site represents a natural extension to the development boundary and is one which will be contained between the A72, the railway cycle route and existing development to the west of Traquair Road. (118 (2 of 2))</p> |
| Growing your economy: Question 6 | Potential new sites - Innerleithen | The respondent has submitted three potential sites for development within the Innerleithen area. These are sites at Tweedbank Farm, Caddonbank Pool and Howford Crossing and Old Airstrip. (67) |
| Growing your economy: Question 6 | BWESR001, Land South West of Mansefield House, Westruther | <p>SEPA state that there appears to be a drain partially culverted running along the northern boundary of the site. This should be protected and de-culverted if possible. It is therefore recommended that a site requirement is attached requiring a feasibility study including a flood risk assessment to be undertaken prior to development to assess the potential for channel restoration.</p> <p>SEPA require an FRA which assesses the risk from the small watercourse adjacent to the site. Site is relatively flat and hydrology would appear complicated at site. Consideration should be given to bridge and culvert structures which may exacerbate flood risk. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.</p> <p>There is a surface water hazard identified.</p> <p>Foul water must connect to the existing SW foul network. There appears to be a drain partially culverted running along the northern boundary of the site. This should be protected and de-culverted if possible. Depending on the use of the proposed units there may be a requirement for permissions to be sought for certain activities from SEPA. (119)</p> |

QUESTION 7

Do you agree with the preferred options for additional housing sites? Do you agree with the alternative options? Do you have other alternative options?

QUESTION 7

Do you agree with the preferred options for additional housing sites? Do you agree with the alternative options? Do you have other alternative options?

| Main Issue | Sub Issue | Summary of Main Issues Raised |
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| Darnick, Denholm, Dolphinton, Eddleston, Gordon, Grantshouse, Greenlaw, Hawick, Jedburgh, Oxton, Peebles, Smailholm & Westruther | All preferred housing sites | The contributor agrees with all the preferred options for housing within the MIR. (171, 230, 263, 274) SEPA agree with the preferred options for additional housing sites as proposed in the MIR. During the course of the call for sites exercise they provided comment in terms of flood risk, the water environment and co-location with SEPA-regulated processes with regards to a range of additional potential housing sites. During that process, they identified sites which should not be included within the plan. (119) |
| Darnick, Denholm, Dolphinton, Eddleston, Gordon, Grantshouse, Greenlaw, Hawick, Jedburgh, Oxton, Peebles, Smailholm & Westruther | All preferred housing sites | The contributor disagrees with all the preferred options for housing within the MIR. (90, 166, 172, 207, 209, 233) The contributor disagrees with all the preferred site allocations set out within the MIR and contend that there is a need to identify further appropriate housing land opportunities with the Western Borders area to ensure that demand is met and pressure on Peebles is reduced. (117) |
| Ancrum, Coldstream, Crailing, Darnick, Dolphinton, Denholm, Eckford, Eddleston, | All preferred and alternative sites | The contributor disagrees with all the housing options (preferred and alternative) within the MIR. (95, 150, 170, 175, 193,194, 204, 217, 265) |

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| Ednam, Galashiels, Gordon, Grantshouse, Greenlaw, Hawick, Jedburgh, Melrose, Oxton, Peebles, Reston, Selkirk, Smailholm, Westruther | | |
| Ancrum, Coldstream, Crailing, Darnick, Dolphinton, Denholm, Eckford, Eddleston, Ednam, Galashiels, Gordon, Grantshouse, Greenlaw, Hawick, Jedburgh, Melrose, Oxton, Peebles, Reston, Selkirk, Smailholm, Westruther | All preferred and alternative sites | The contributor agrees with the preferred and alternative housing options within the MIR (259, 262) The contributor generally agrees , but difficult to comment when sites are across various settlements. (289) |
| Ancrum, Coldstream, Crailing, Darnick, Dolphinton, Denholm, | All preferred and alternative sites | Scottish Water support any of the preferred or additional housing land supply sites emerging from the report. They accept that there are pressures to identify land for development near or next to their treatment works. They strive to ensure the impact of their activities is kept to a minimum. Any development in close proximity to their works, increases the risk of odour and/or noise complaints from residents in these new developments. Scottish Water would expect a reasonable stand-off distance |

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| <p>Eckford, Eddleston, Ednam, Galashiels, Gordon, Grantshouse, Greenlaw, Hawick, Jedburgh, Melrose, Oxton, Peebles, Reston, Selkirk, Smailholm, Westruther</p> | | <p>to be applied in this instance where no units (including garden areas) are permitted. In addition, an odour impact assessment must be carried out by the developer to understand when additional measures are required to mitigate potential odour nuisance.</p> <p>Access is required to treatment works 24 hours a day, 365 days a year by maintenance vehicles, articulated vehicles and tankers.</p> <p>Early engagement with Scottish Water is essential and they are currently planning to deliver water growth investment in and around Peebles to ensure existing and future customers continue to receive a high quality service which they have come to expect.</p> <p>They recognise that there is a degree of uncertainty around the final housing numbers and locations at this time. It is vital that Scottish Water deliver the most sustainable solution for future growth in this catchment and therefore continue to work closely with the Council to support sustainable economic growth as they progress with the Council's preferred spatial strategy emerging from the LDP. (323)</p> |
| <p>Allanton</p> | <p>AALLA001, West of Blackadder Drive</p> | <p>The contributor states that there should be some allocation of housing in Allanton, in respect of this site (AALLA001). Requests re-consideration of the site (AALLA001) and addresses points raised in the previous site assessment, in respect of; site capacity, phasing, fit with the village development pattern, ancient woodland, designed landscape, agricultural land, impact on the character and integrity of the listed buildings and Conservation Area and effectiveness within the LDP period.</p> <p>They state that it is important that all Berwickshire villages should have the capacity for some growth, not least for affordable housing for young families to offset demographic trends.</p> <p>The contributor has submitted supporting information in relation to their submission (AALLA001), making reference to the previous site assessment undertaken by the Council. The contributor states that the site would not threaten the historic pattern of the village plan, development here would be on the axis that created it and the site is tucked away from the Main Street and would not impact directly on the Conservation Area. They state that the site put forward is large, but a smaller site would easily be made available, for 5-6 houses. (326)</p> |
| <p>Ancrum</p> | <p>AANCR002, Dick's Croft II</p> | <p>The contributor states that Ancrum STW is just to the south of the development. This is not expected to cause any particular issues although any odours would be dealt with by Scottish Borders Council Environmental Health. Due to steep topography adjacent/ through the allocation site, consideration should be given to surface runoff issues to ensure adequate mitigation is implemented. Site will need careful design to ensure there is no increase in flood risk elsewhere and the proposed development is not affected by surface runoff. The contributor also states that wastewater must connect to the existing</p> |

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| | | <p>Scottish Water foul network. It is likely that for a development of this size and upgrade may be required to the existing STW. This should be confirmed by Scottish Water. The contributor also advises that the site has a potential surface water hazard and water environment considerations. (119)</p> <p>The contributor considers the site should be taken forward as a preferred site not an alternative site. (122, 174)</p> <p>The contributor notes that whilst designated as an 'alternative' site within the MIR it is, within the 'overall assessment' deemed to be 'acceptable'. The contributor states the site will sustain local facilities, is not at flood risk, is next to existing built form and roads and is therefore close to existing infrastructure and utilities. The contributor also states there is interest being shown from housebuilders and there is also further interest from a local Registered Social Landlord for the provision of at least 12 affordable units on site. The contributor states that Ancrum is a very popular place to live; however, there is no land for housing allocated within the current LDP period. It is important that land allocations are made in sustainable and sought after locations to live. The contributor has also submitted an indicative site layout alongside their submission. (122)</p> <p>The contributor welcomes that the protection of existing trees is listed as a site requirement. A tree survey should also be required to help assess the trees. In addition we recommend the use of the Ancient Tree Inventory or a tree survey to assess if any trees are ancient or veteran and therefore should be protected from adverse impacts of development. Any additional tree planting should be with native species, sourced and grown in the UK. (199)</p> <p>The contributor states the site lies outwith the current settlement boundary as shown in the LDP and is within a Special Landscape Area. If you are minded to support development of this site during the current plan period, further detailed assessment will be required. Given the site's location within a Special Landscape Area we recommend that this site is subject to a development brief which should set out the approach to placemaking and the measures necessary to integrate development within its wider landscape setting. (213)</p> |
| Blyth Bridge | ABLYT004 Blyth Bridge South, & SBPLY002 Blyth Bridge Development Boundary | <p>The contributor seeks the allocation of site ABLYT004 within the LDP2 for 2 to 3 units. They state that the current Development boundary does not provide any scope for development. The MIR appears to mainly identify large sites, and if small local sites such as this one was identified, it would allow for small builders to contribute to the housing supply. In 1980 small and medium housebuilders contributed to 57% of all housing completions but this has now changed. Scottish Government and local Councils unwittingly have become the greatest ally of the volume housebuilders by favouring the release of large sites which only large national housebuilders are resourced to develop. (264)</p> |

| | Amendment | |
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| Blyth Bridge | ABLYT005 East of Blyth Farm | <p>The contributor seeks the allocation of site ABLYT005 within the LDP2 with an indicative capacity of 6 units. The site represents a logical small extension to the settlement, at a position immediately adjacent to existing development. It is proposed that only the southern portion of the land be developed, with woodland planting to the north. This would provide a defensible edge and visual separation between the housing and the farm as well as helping to assimilate the housing into the landscape setting. It is considered that the proposal would not be detrimental to the landscape character. There is known difficulty with securing short and medium term allocations for residential development within the Northern Housing Market Area generally. LUC's '<i>Western Rural Growth Area: Development Options Study</i>' encompasses much of the Northern Housing Market Area and was commissioned to identify and assess options for housing and business and industrial land within Central Tweeddale over an area stretching from Eddleston to beyond Walkerburn. It is acknowledged that Blyth Bridge lies to the west of the Rural Growth Area (RGA) but it does lie within the Northern Housing Market Area. Blyth Bridge is a popular place in which to live, mainly due to its countryside setting, combined with reasonable public transport links to both Edinburgh and Peebles/ West Linton and beyond. It is important that land allocations are made in sustainable and sought after locations where development proposals will come forward and be deliverable in a reasonable time-frame on account of demand and lack of major infrastructure constraints.</p> <p>(317)</p> |
| Cardrona | ACARD002 West of B7062 | <p>The contributor seeks the allocation of this site within LDP2. The land is adjacent to the village of Cardrona and all services including Water, Electricity, Gas and Sewage are already within the site or can be accessed nearby. Discussions are underway with a developer and local RSL who are interested in developing the site for affordable, sustainable housing. The site is put forward to enable a phased development of around 75 houses in total. A number of the houses proposed will include home working spaces to reduce commuting, and appeal to large number of micro businesses which exist in the Borders (95% of all businesses in the Borders have 5 employees or less). The land was previously considered for inclusion in the Local Plan in 2006 and the Reporter made comment that developing directly onto or in a linear formation along the B7062 was not acceptable. The proposal would therefore be to take an access road at both ends of the site which could either then become a re-routed B7062 with all housing remaining below the road to offer more cohesion with the village. The current B7062 could form part of the village as a multi-use road with a safe environment whilst the new B7062 would maintain the rural nature that was referred to as being important by the Reporter. The other site proposed at Cardrona/Nether Horsbrugh in the MIR is considerably more visible from the A72 than this site. The housing that is being proposed for the site is low impact, sustainable housing and the site will also include a full landscape plan which will integrate those houses into the landscape. The introduction of LED street lights within the Borders has significantly lessened the light pollution from any development which is particularly noticeable in the current Cardrona village. There are now several houses which have been</p> |

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| | | developed along the B7062 on the opposite side from these fields and there is now pavements, street lights and a speed limit, all of which were not there in 2006. (308) |
| Cardrona | ACARD003 West of Cardrona, | The contributor seeks the allocation of this site in addition to or instead of some of the proposed sites contained within the MIR. Cardrona has the capacity allow for further housing growth in the Borders and to take pressure off constrained such as Peebles. The site could accommodate 30-40 housing units. The identification of SCARD002 to the north of Cardrona for longer term mixed use indicates that the Council recognise the opportunity for further development at Cardrona. The Proposed site is considered to be more favourable in planning terms that SCARD002 and will have less impact on the landscape than site SCARD002. It is noted that the contributor has submitted a Landscape and Visual Impact Appraisal as part of their submission. The contributor also notes a number of constraints in relation to the sites identified within the MIR. The site is considered to be deliverable in the short term given the housing demand in this part of the Borders. (117) |
| Cardrona | Housing | The contributor states that they would support further housing at Cardrona. (273) |
| Cockburnspath | ACOPA007, Land to North of Hoprig Road | The contributor has submitted a new site for consideration (ACOPA007) for housing. They believe that the small scale housing site put forward provides an excellent opportunity to allow appropriate development in Cockburnspath, in support of local facilities and retention of the local population. The contributor states that the site is located within an area that both SESplan and the current LDP have identified as appropriate for future development. They believe that a new housing development within Cockburnspath is desperately needed as the last housing development was built in the 1990's and the last housing planning application was approved in 2005. Now only would this site contribute to the effective housing land supply but would also contribute to the improvement of Cockburnspath overall. The contributor notes that 2 existing housing allocations (BC10B and BCO4B) within Cockburnspath have not come forward, despite being allocated for many years. Based on market knowledge, they are confident that self-build plots on this site, will sell well, as there is significant growth in the number of people wanting to build their own homes. (132) |
| Cockburnspath | ACOPA008, Land to North of Dunglass Park | The contributor has submitted a new site for consideration (ACOPA008) for housing, as an alternative site to those presented in the MIR. It is put forward either in addition to the two existing housing allocations within the LDP, or as a replacement site for the existing allocation (BCO10B). They state that the land would form an excellent housing allocation option to help serve the growth of Cockburnspath over the expected 10 year LDP2 period. Development of the land would link with the Estate's plans to reuse the Pathhead Farm steadings for mixed use development such as a local hub. The contributor supports the inclusion of the site and puts forward a number of justifications, summarised below; |

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| | | <ul style="list-style-type: none"> • 3rd housing allocation will bring competition and fresh impetus to the delivery of housing in Cockburnspath. Allocated sites have, as yet, failed to deliver any housing; • In line with Council's direction for future development and the site would bring forward much needed housing to sustain the settlement; • The addition of the site could be delivered in conjunction with the (BCO4B) site, should it come forward. A larger housing allocation may attract a volume house builder; • Would help LDP2 to plan strategically for the long term growth of Cockburnspath. It would also channel development in the most logical direction; • Would support key outcome 2 & 9 of the LDP; and • Close to Dunbar where further key services and amenities are located and there is excellent existing transport links on the A1 to Dunbar and the rail station/potential Reston station. <p>They argue that the site will help provide delivery of housing in Cockburnspath, and assist the Borders to meet their housing land supply targets.</p> <p>The contributor states that if the Council were of the opinion that three allocations would result in too much development pressure, they consider it reasonable to suggest that the existing allocation (BCO10B) should be de-allocated and replaced with this site. (132)</p> |
| Cockburnspath | SBCOP001, Cockburnspath Development Boundary Amendment | <p>The contributor has submitted a proposal for a settlement boundary amendment (SBCOP001). They state that the proposed extension to the settlement boundary, along with the proposed housing site put forward (ACOPA007), directs development to an appropriate location within the settlement which is at a suitable scale. The contributor indicates that the land owner is exploring the possibility for affordable housing within this area, separately.</p> <p>The inclusion of this land presents visual cohesion and a natural build edge of the settlement in this location. (132)</p> |
| Coldingham Sands | ACOLH005, Land North West of Creel House | <p>The contributor makes reference to the site (ACOLH005), which was submitted at the 'Call for Sites' stage. They state that the topography of this area has the potential to absorb several houses fitted unobtrusively into the fold of the ground along the footway to the Creel Path, making for a completely natural small extension to the village.</p> <p>The contributor states that it seems there needs to be an input of urban design skills into the LDP process to help create a policy more suited to settlements like Coldingham Sands than the '<i>housing in the countryside</i>' policy.</p> |

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| | | <p>An initial step would be to give Coldingham Sands the status of a village and they argue that the development boundary is drawn to include the land adjacent to Creel House.</p> <p>The contributor put forward a paper for 'row housing' in modern rural development, as a contribution to the debate on how to achieve higher standards of design.</p> <p>(327)</p> |
| Coldstream | ACOLD011, Hillview North 1 (Phase 1) | <p>The contributor objects to the inclusion of the site (ACOLD011) within the Housing SG. They argue that the site is not effective, desirable or deliverable for housing and that it does not meet all the tests within the PAN or key policy criteria/content, for the reasons set out below;</p> <p>Ownership: The contributor queries whether it is feasible to create access to the site. All of the proposed access points involve land in different ownerships and the construction of roads to the site. This process is expensive and legally complex and it must be questionable as to how access will be achieved.</p> <p>Access: The contributor recognises that it has been noted that the extension off to the A6112 would intervene on the industrial estate. Their opinion is that this route will result in problems in the long run, where road safety conflicts will arise between residents and the operations of the future industrial development. Again, the contributor states that there must be better development land options than the two sites which avoid such issues.</p> <p>Physical: The contributor raises concerns regarding the topography of the land. In terms of flooding, SEPA flood maps do not show that there is an immediate flood risk to the sites however there is risk of surface water impacts to the east of the site in particular. This will require to be investigated and may affect the amount of development land available. There are other sites within Coldstream and Berwickshire where flood risk is not an issue at all.</p> <p>Prime Quality Agricultural Land: The land is prime quality agricultural land which is capable of producing a wide range of crops. In addition to damaging crop land, vegetation and natural habitat is also likely to be destroyed. This is contrary to Policy ED10. There are other sites within Berwickshire which are more suitable for housing and the good quality land in question should not be developed upon.</p> <p>Distance to Town Centre: The contributor raises concerns regarding the distance from the site to the town centre and other essential amenities.</p> <p>Roads Infrastructure: The contributor advises that they are aware that the Roads Planning Officer has proposed 3 access routes however the contributor is uncertain that these roads have the capacity and</p> |

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| | <p>suitability to support higher volumes of traffic, particularly any route through Hill View or Hartfield Loan. The likelihood of residents taking the car to the town centre would be high due to the long walking distances. Promoting a site which would increase the use of cars is contrary to the aims of Policy PMD1. Extensive car use is detrimental to air quality and may bring adverse health impacts to the area. There are better development site options in Coldstream that are within walking distance of the town centre and other key amenities, such as medical facilities. We consider that housing land closer to amenities in other settlements in Berwickshire is also better in line with respective planning policies than locating development in these locations.</p> <p>Infrastructure: In terms of infrastructure which exists on the site, the need for diversion of a water mains requires to be investigated. Raised concerns regarding the cost of this infrastructure requirement.</p> <p>Question whether the site can be considered effective if longer sections of roads, sewage and water pipes, and major earthworks are required. It appears more logical to allocated sites that are easier to develop, easier in Coldstream or elsewhere in Berwickshire.</p> <p>Placemaking Considerations: The contributor states that the Council appear not to have given due weight to placemaking considerations when allocating/proposing this sites. It is also the case that by allocating remote housing allocations, car usage will be encourages which will then bring adverse impacts on the town centre due to parking issues and adverse amenity from congestion/air quality.</p> <p>The contributor does not consider that this site meets the placemaking consideration within the existing LDP or associated Supplementary Guidance for the following reasons:</p> <ul style="list-style-type: none"> - Development will not have a positive sense of place in relation to the existing settlement of Coldstream, instead the site will be divorced from the settlement, poorly related to the existing built character and beyond a mature planting belt; - Development will not be compatible with the surrounding land uses, the amenity of residents will be dominated by traffic and noise associated with the farm and industrial estate; - Deliver of housing in this location will necessitate the creation of artificial boundaries; - It is unclear how creation of path/cycle linkages will be provided. This is a key issue, the MIR details that the population in the Borders is ageing. However, these housing sites are located far removed from the town centre and key medical facilities. This issue affects prospective residents with mobility issues. The site brings the risk of social isolation, as opposed to bolstering Coldstream and it's key facilities/services; - There are alternative housing sites possible in Coldstream and elsewhere in the Borders, where meaningful connections to existing open spaces and path linkages are realistic; and |
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| | | <p>- Development of an access road through the planted boundary is contrary to Policy EP3.</p> <p>Funding and Marketing: Given the evident challenges of delivering housing, the contributor considers it questionable as to how the sites will be sold to a housing developer. Coldstream has a challenging housing market and it seems illogical to allocate difficult to market housing sites when there are more marketable sites elsewhere in Coldstream and Berwickshire.</p> <p>Land Use Conflict with Farming Operations: The development would severely affect farming operations at Coldstream Mains Farm. The contributor considers that the vehicular movements, site operations, noise and odour from the farm mean that deliverability of housing at the site is seriously in question. In particular there are road safety and health and safety issues due to:</p> <ul style="list-style-type: none"> - Prospective residents gaining access when not permitted; - Mixing with delivery traffic/site operations; - Being subject to noise; and - Being subject to odour/air quality issues. <p>Farming operations and industrial use do not compliment housing allocations sensitively and conflicts will arise. (81)</p> |
| Coldstream | ACOLD014, Hillview North I (Phase 2) | <p>The contributor states their previous advice on this site was, that it would form a significant addition to the existing settlement and would therefore need to ensure measures to deliver natural heritage mitigation and enhancement as part of any future site development.</p> <p>They recommend the following;</p> <ul style="list-style-type: none"> • New structure planting/landscaping, should be planned to improve the setting of the site and to establish a framework for delivery of the remainder of the long-term safeguard site (ACOLD011); • Existing shelter belts should be retained and enhanced with additional planting. Suitability of locating active travel routes along these linear features should also be considered due to their potential role in providing setting and shelter for users; and • Open space should provide multiple benefits and be linked into wider habitat and active travel networks. (213) |
| Coldstream | ACOLD014, Hillview North (Phase 2) | <p>SEPA advise that there is a potential surface water hazard on this site.</p> <p>SEPA advise that a review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within this site. This should be investigated further and it is recommended that contract is</p> |

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| | | <p>made with the flood prevention officer. In addition, the surface water flood map indicates a potential flow path which can indicate a potential small watercourse. Review of Scottish Water information and historic maps does not indicate the presence of a small watercourse. This should be explored further during site investigations.</p> <p>Foul drainage from the development must be connected to the existing Scottish Water foul sewer network. (119)</p> |
| Coldstream | ACOLD014, Hillview North I (Phase 2) | <p>The contributor objects to the inclusion of the site (ACOLD014) within the MIR, as an alternative option. They argue that the site is not effective, desirable or deliverable for housing and that it does not meet all the tests within the PAN or key policy criteria/content, for the reasons set out below;</p> <p>Ownership: The contributor queries whether it is feasible to create access to the site. All of the proposed access points involve land in different ownerships and the construction of roads to the site. This process is expensive and legally complex and it must be questionable as to how access will be achieved.</p> <p>Access: The contributor recognises that it has been noted that the extension off to the A6112 would intervene on the industrial estate. Their opinion is that this route will result in problems in the long run, where road safety conflicts will arise between residents and the operations of the future industrial development. Again, the contributor states that there must be better development land options than the two sites which avoid such issues.</p> <p>Physical: The contributor raises concerns regarding the topography of the land. In terms of flooding, SEPA flood maps do not show that there is an immediate flood risk to the sites however there is risk of surface water impacts to the east of the site in particular. This will require to be investigated and may affect the amount of development land available. There are other sites within Coldstream and Berwickshire where flood risk is not an issue at all.</p> <p>Prime Quality Agricultural Land: The land is prime quality agricultural land which is capable of producing a wide range of crops. In addition to damaging crop land, vegetation and natural habitat is also likely to be destroyed. This is contrary to Policy ED10. There are other sites within Berwickshire which are more suitable for housing and the good quality land in question should not be developed upon.</p> <p>Distance to town centre: The contributor raises concerns regarding the distance from the site to the town centre and other essential amenities.</p> <p>Roads infrastructure: The contributor advises that they are aware that the Roads Planning Officer has</p> |

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| | <p>proposed 3 access routes however the contributor is uncertain that these roads have the capacity and suitability to support higher volumes of traffic, particularly any route through Hill View or Hartfield Loan. The likelihood of residents taking the car to the town centre would be high due to the long walking distances. Promoting a site which would increase the use of cars is contrary to the aims of Policy PMD1. Extensive car use is detrimental to air quality and may bring adverse health impacts to the area. There are better development site options in Coldstream that are within walking distance of the town centre and other key amenities, such as medical facilities. We consider that housing land closer to amenities in other settlements in Berwickshire is also better in line with respective planning policies than locating development in these locations.</p> <p>Infrastructure: In terms of infrastructure which exists on the site, the need for diversion of a water mains requires to be investigated. Raised concerns regarding the cost of this infrastructure requirement.</p> <p>Question whether the site can be considered effective if longer sections of roads, sewage and water pipes, and major earthworks are required. It appears more logical to allocated sites that are easier to develop, easier in Coldstream or elsewhere in Berwickshire.</p> <p>Placemaking Considerations: The contributor states that the Council appear not to have given due weight to placemaking considerations when allocating/proposing this sites. It is also the case that by allocating remote housing allocations, car usage will be encourages which will then bring adverse impacts on the town centre due to parking issues and adverse amenity from congestion/air quality.</p> <p>The contributor does not consider that this site meets the placemaking consideration within the existing LDP or associated Supplementary Guidance for the following reasons:</p> <ul style="list-style-type: none"> - Development will not have a positive sense of place in relation to the existing settlement of Coldstream, instead the site will be divorced from the settlement, poorly related to the existing built character and beyond a mature planting belt; - Development will not be compatible with the surrounding land uses, the amenity of residents will be dominated by traffic and noise associated with the farm and industrial estate; - Deliver of housing in this location will necessitate the creation of artificial boundaries; - It is unclear how creation of path/cycle linkages will be provided. This is a key issue, the MIR details that the population in the Borders is ageing. However, these housing sites are located far removed from the town centre and key medical facilities. This issue affects prospective residents with mobility issues. The site brings the risk of social isolation, as opposed to bolstering Coldstream and it's key facilities/services; - There are alternative housing sites possible in Coldstream and elsewhere in the Borders, where |
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| | | <p>meaningful connections to existing open spaces and path linkages are realistic</p> <ul style="list-style-type: none"> - Development of an access road through the planted boundary is contrary to Policy EP3. <p>Funding and Marketing: Given the evident challenges of delivering housing, the contributor considers it questionable as to how the sites will be sold to a housing developer. Coldstream has a challenging housing market and it seems illogical to allocate difficult to market housing sites when there are more marketable sites elsewhere in Coldstream and Berwickshire.</p> <p>Land Use Conflict with Farming Operations: The development would severely affect farming operations at Coldstream Mains Farm. The contributor considers that the vehicular movements, site operations, noise and odour from the farm mean that deliverability of housing at the site is seriously in question. In particular there are road safety and health and safety issues due to:</p> <ul style="list-style-type: none"> - Prospective residents gaining access when not permitted; - Mixing with delivery traffic/site operations; - Being subject to noise; and - Being subject to odour/air quality issues. <p>Farming operations and industrial use do not compliment housing allocations sensitively and conflicts will arise. (81)</p> |
| Crailing | ACRAI004, Crailing Toll (Larger Site) | <p>The contributor advises that the site has water environment considerations. The contributor requires a Flood Risk Assessment which assesses the risk from the small watercourse which would appear to be culverted either through or immediately adjacent to the site. The contributor does not support development over culverts that are to remain active. The contributor also states that there is no SW foul sewer network in this location. Consideration should be given to first time sewerage for this village to include the existing and proposed development site. Failing that private drainage would need to be provided with discharge to the Oxnam water (as opposed to the small burn). The contributor states that there may be a culvert running through or close to the site boundary and opportunities should be taken to de-culvert. <i>Note: Contributor 119 has referred to this site as ACRAI003. (119)</i></p> <p>The contributor states the site should not be allocated as a housing site. Another site (ACRAI001) which is adjacent to this proposed site is available and has been allocated and undeveloped for the past 5-10 years. A combined capacity of potentially 10 houses would have a disproportionate impact upon the village and place immense pressure on the existing small road route to the A698. (312)</p> |
| Darnick | ADARN005 | The contributor considers the proposed house numbers to be too high/dense for this 0.8ha site, |

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| | (Land South of Darnlee) | especially as it would be very visible on entering the village and appear incongruous next to the parkland surroundings of Darnlee. A more tree-scaped development of five houses could be more acceptable. (60) |
| Darnick | ADARN005 (Land South of Darnlee) | SEPA has advised that the site has water environment considerations. (119) |
| Darnick | ADARN005 (Land south of Darnlee) | The contributor is opposed to ten units here, in this highly visible location at the edge of the settlement as it is too great a number to fit into the parkland setting. Perhaps half that number of different, individually designed houses each with well screened garden ground would fit more appropriately and acceptably here. Tree planting should be a requirement. If the ground is privately owned, not by a developer, perhaps the plots could be sold off individually, to prevent the character of the development from looking like an estate plonked on the landscape. Was this not part of a historic battlefield site? (143) |
| Darnick | ADARN005 (Land South of Darnlee) | Melrose and District Community Council support the preferred option of Darnlee in Darnick provided it allows for road and junction improvements in Broomilees. (153) |
| Darnick | ADARN005 (Land South of Darnlee) | Contributors do not agree with this proposed site for the following reasons: <ul style="list-style-type: none"> • Setting of the listed building of Darnlee is totally compromised. • Visual amenity and character of the entrance to the village would be severely degraded. The whole character of the area will be changed. • 10 houses plus auxiliary parking constitutes a severe over-development of a restricted 0.8 ha site. A perfect example of over-development and visual degradation is what the Council has allowed to happen on the site of Darnick Green at the south-east end of Darnick adjacent to Chiefswood Road - houses jammed in 'cheek-by-jowl' and abutting closely on the road adjacent to the site. • 10 houses of the high value likely to be proposed by developers at Darnlee will undoubtedly generate 20 plus cars. These will exacerbate problems on a road system already hazardous - viz. junction on to B6394 with the opposite developments of Abbotsford Terrace and Heiton Park. Any access onto Broomilees Road is a total nonsense. Zero traffic will not head west along single-track roads towards Abbotsford. It will all arrive at the junction with Abbotsford Road where there are even more hazardous site-lines to both south and north due to a combination of bends in the road and parked cars. The site should be removed permanently from the plan as it is an unsuitable site for building, totally overshadowing what is, in effect, a medieval village. (153) |
| Darnick | ADARN005 (Land south of Darnlee) | The Woodland Trust Scotland (WTS) note that the western part of the site is allocated on an area of woodland. Currently this area is not listed on the AWI or on the NWSS, WTS note that some of the trees on the western and southern boundaries appear on historic OS six-inch maps and therefore are worthy of further study to determine whether they could be ancient or veteran trees. A tree survey should be listed as a site requirement and WTS recommend that the ATI or a tree survey is also used to determine the |

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| | | ancient or veteran character of the trees. Alternatively the site boundary can be reviewed to exclude the area of woodland on the western side. (199) |
| Darnick | ADARN005 (Land south of Darnlee) | SNH note that the majority of the site lies within the Eildon & Leaderfoot Hills NSA. The site also forms an important context for, and a gateway to, Darnick. Its location within the NSA means that a high standard design will be required. Given the site's sensitive location, its mature trees and boundary features, SNH consider that a more specific set of site requirements should be drafted for this site in the form of a site development brief. This is in order to mitigate adverse impacts on the NSA and to ensure the delivery of a high standard of development, including materials, siting and design. Without the benefit of further verification from a site visit, at this stage SNH suggest that specific advice is needed to secure the retention of important trees and boundary within an overall placemaking and site design approach. For example, "Retain and protect the existing boundary features and trees, where possible" should be altered to "Retain and protect the existing boundary features and trees, integrating them appropriately within an overall layout which demonstrates a co-ordinated approach to placemaking". (213) |
| Denholm | ADENH006 (Land south east of Thorncroft) | SEPA require a Flood Risk Assessment (FRA) which assesses the risk from the small watercourses which flow along the boundary of the site. These watercourses then enter a Flood Protection Scheme which will require careful consideration to ensure there is no increase in flood risk due to site development. The study undertaken by JBA indicates that part of the site is at risk of flooding but it does not appear to have fully modelled the adjacent watercourse. Consideration will need to be given to any culverts/ bridges which may exacerbate flood risk. Site may be constrained due to flood risk. Due to steep topography through the allocation site, consideration should be given to surface runoff issues to ensure adequate mitigation is implemented. Site will need careful design to ensure there is no increase in flood risk elsewhere and proposed housing is not affected by surface runoff. The site has a potential surface water hazard and water environment considerations. Foul water must connect to the existing SW foul network. Opportunities should be taken to protect and enhance the watercourse which runs along the site boundary. (119) |
| Denholm | ADENH006 (Land south east of Thorncroft) | The contributor supports the draft allocation. All the site requirements specified in the preferred option are capable of being met. This land is free from constraints and the adjacent property has been acquired to provide sightlines for a new access to the A698 road. The owners allowed Eildon Housing to construct both surface water and foul sewers across their site, and these were upgraded in capacity to allow this system to accept flows from the proposed development. Connection points to these public sewers can be made from within the draft allocated site. The site lies within the development boundary of Denholm and is, in part, a brownfield site. Public transport is available immediately adjacent. (224) |
| Dolphinton | ADOLP004 Land to the North of Dolphinton | The contributor supports the inclusion of ADOLP004 as a Preferred Option and states that they would be delighted to respond and address any comments which arise through the MIR consultation. The contributor states that only 10 units on the site as they may be for people who wish to work from home or would wish to have a downstairs bedroom. (1 (2 and 3 of 3)) |

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| Dolphinton | ADOLP004 Land to the North of Dolphinton | <p>The contributors object to the inclusion of site ADOLP004 as a Preferred option stating that the site is promoting unsustainable expansion of a place that has no facilities with exception of a village hall located half a mile away, new development should be directed to places with a range of facilities; development at this location would increase dependency on the private car as there are limited bus services; given the scale of the site the majority of the proposal will not result in affordable homes; the primary school at West Linton is already at capacity; there is no public sewage available for this proposal and addressing this matter would have a major impact on biodiversity. The addition of 10 houses as well as the 5 from the adjacent allocation will have a negative impact on soil if soaks are used, the contributor states that their ground already suffers due to the former railway yards. There is limited infrastructure for surface water in Loanend as only a basic SUDS is in operation and additional development would encourage more surface water problems in the vicinity and be drawn towards existing properties. House sales within the settlement have been slow. The proposal would detract from the area and it is tenuous at best to describe the site as a brownfield site.</p> <p>Consent has been given for 5 houses on the adjacent site (ADOLP003), at what stage has things changed that another site is now being considered.</p> <p>Contributor 15, also notes that the Council refused an application on the opposite site of the A702 a few hundred yards away from this site and now the Council are supporting the development of this site which there appears to be little difference.</p> <p>Contributor 44 also states that development at this location would result in affecting the view from the rear of their property, as well as the openness and quietness of the established housing with direct impacts on their property in terms of noise, and light, and value too, taking a family property in an open and picturesque spot, and boxing it in with a new development.</p> <p>Additional comments have also been submitted in relation to the adjacent allocation for housing ADOLP003 which was not subject to this public consultation, and that has a consent which should be revoked. Those comments relate to LDP1 site assessment, landscaping, privacy, affordable housing, overhead cables, and alterations to the current road structure.</p> <p>(14, 15, 26, 44)</p> |
| Dolphinton | ADOLP004 Land to the North of Dolphinton, Dolphinton | <p>The contributor states that a Pollution Prevention and Control (PPC) part B cement batcher is currently located south west of the development at 'Heywood'. Likely issues: dust. They therefore recommend that the Council consults the operator of adjacent regulated sites and Environmental Health colleagues and considers the compatibility of these proposed development sites with the existing adjacent regulated activity which may operate, or expand to operate, 24 hours a day.</p> <p>The contributor states that the site has the potential for surface water flood risk and therefore</p> |

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| | | <p>recommends that this issue is taken forward through discussion with the flood prevention and roads department colleagues and Scottish Water, where relevant. It is noted that additional site specific information may only serve to identify that development at the site would be contrary to the SPP and the principles of sustainable flood management.</p> <p>All new developments should manage surface water through the use of Sustainable Urban Drainage Systems (SUDS). The contributor recommends that this requirement includes the use of SUDS at the construction phase in order that the risk of pollution during construction to the water environment is minimised.</p> <p>This development site does not appear to be served by the SW foul sewer network. However, the foul network is not far from the proposed site and hence this is the preferred option. It is likely that the SW foul network/STW would require to be upgraded to accommodate the development site. Opportunity should also be taken to pick up existing properties to the south and west of the development area. (119)</p> |
| Dolphinton | ADOLP004 Land to the North of Dolphinton, Dolphinton | <p>The contributor states that this section of the A702 is characterised by small groups of houses, often screened wholly or partly by well-established woodland and boundary planting. If allocated, the contributor recommends that a site brief is prepared, this should include:</p> <ul style="list-style-type: none"> • Retention of woodland along the A702 boundary of the site; • Maintain and enhance pedestrian and cycle access established by LDP1 allocation DOLP003. (213) |
| Dolphinton | ADOLP004 Land to the North of Dolphinton, Dolphinton | <p>The contributor states that the woodland are not on AWI or in the NWSS but we welcome the site requirements asking for the woodland to be protected and enhanced through additional planting. However, they stress that the additional planting should be native and UK sourced and grown. (199)</p> |
| Duns | ADUNS027, Land North of Preston Road | <p>The contributor makes reference to the exclusion of (ADUNS027) from the Main Issues Report and addresses the following points raised in the site assessment conclusion;</p> <ul style="list-style-type: none"> • There are a number of proposed housing sites within the local plan which are located on agricultural land. Therefore, it is felt that this is not a significant constraint; • Surface water run-off could be dealt with during the construction phase by installing adequate drainage. Therefore, it is felt that this is not a significant constraint; • The contributor states that the site is not visible from Duns Castle, nor if Duns Castle visible from the site; • Appreciate that the site is located within an area with potential historic interest. Therefore, comfortable that archaeological investigations should be placed as a condition; • Do not accept that development of this site would have a detrimental visual impact. It would simply |

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| | | <p>improve symmetry to the existing development on the opposite side of Preston Road, therefore not elongating the town any further than it already does at present;</p> <ul style="list-style-type: none"> • During the design process measures could be taken in order to work with the existing gradient of the site by perhaps reducing the existing level or restricting the height of the properties. Therefore, not be a limiting constraint for this site's inclusion in the local plan; • There are a number of housing allocations within the Duns area which have existed for a significant period of time and have not yet been developed. The site would only increase this by 2%, therefore having little or no impact on the capacity of Duns. Furthermore, due to the scale and interest from a developer, it is more likely to be developed than any of these other sites already allocated within Duns; and • Consideration could be given to the removing or reassessing some of the existing allocations in order to make way for sites which will get developed. (12) |
| Earlston | MEARL004, Georgefield & East Turrford | <p>The contributor wishes to continue the allocation of their land at Earlston. The contributors states the site is to be a housing-led mixed use development and will incorporate an element of mixed use development. (176)</p> |
| Eckford | AECKF002, Land at Black Barn | <p>The contributor does not agree with the alternative option for Eckford. (168, 244)</p> <p>The contributors consider that redevelopment of the current site would be advantageous but have strong reservations about the site being identified as an alternative option for housing. The contributors raise the following concerns; the site capacity of 10 units seems too dense, there is no wastewater infrastructure in Eckford, the possible contamination of the site and issues relating to the site entrance and associated footways. (103)</p> <p>The contributor states that a review of OS Map indicates a potentially culverted watercourse along the eastern boundary of the site. The contributor would recommend that this is investigated as part of a Flood Risk Assessment. The contributor does not support development over culverts that are to remain active. Any foul water must connect to the existing SW foul network. This may require to be upgraded to accommodate this development. The contributor also advises that the site has water environment considerations. (119)</p> <p>The contributor considers the site out of character with the village and that the site is too small for 10 units. The contributor also raises concerns relating to road and waste water infrastructure, the use of agricultural land for housing and the possibility of the felling of trees to access the site. The contributor states that developments of this type belong to the towns or larger villages, where the infrastructure can handle it. (168)</p> |

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| | | <p>The contributor considers some housing could be put up on the site, the village does not have the capacity/ infrastructure to accommodate so many potential families and there are existing issues with the site itself. The main thoroughfare can be dangerous: there are no pedestrian walkways and public transport has been curtailed already. The existing sewage provision is barely adequate as it is and has been a challenge for recent new builds. The Black Barn has asbestos in the roof so, alongside its previous uses, contamination of the site will need to be carefully examined/controlled. Naturally, any development will need to take account of the historic and natural beauty of Eckford and its surroundings. (244)</p> <p>The contributor recognises that the site has potential for additional development, but if it were to be allocated as such, it should be limited to an absolute maximum capacity of 5 houses. This is because, given the size of Eckford village, an additional 10 houses would have a dramatic and potentially negative impact upon the character of the village. (312)</p> |
| Eddleston | AEDDL008 Land West of Elibank Park | <p>The contributor states that development of this site this would cause the destruction of ancient pasture; increases the risk of pollution to the River Tweed and its tributary; will affect local wildlife and tourism; building has already taken place in the area, which will speed run-off during heavy rain, putting the area downstream at higher risk of flooding. The topography of Peebles and its environs mean the town and its transport links are very vulnerable. The B7062 is not suitable for large vehicles and in places is barely wide enough for two cars. The A703 is still only a double track road that can be very fast and as the main route out of the Borders is very busy. The A72 is already busy and fast, it is frequently closed due to accidents, is narrow in places, causing bottlenecks and risking lives if emergency services need to get through. There is no alternative route. It is also vulnerable to flooding and risk of erosion by the Tweed, and development on agricultural land will exacerbate flooding. With the rise in the number of users on the A72 there will be an increase in the number of accidents particularly with cyclists. With the increase in population in the area, it will result in further stretching existing services and facilities including education. The proposal will also result in an increase in the number of houses, businesses and their occupants doing more journeys to get to work, shops, etc as there are limited facilities in the area thereby increasing our carbon footprint. The development on agricultural land used for food production is unwise and may impact on food security. (108 (2 of 2))</p> <p>All housing in Eddleston should be removed until you deal with the lack of provisions in the Schools, Doctors etc. (158)</p> <p>Concerns new developments could add to flood risk from increased surface runoff. The development would be very visible and 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</p> |

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| | <p>climate change mitigation and safety. (46)</p> <p>Given the lack of landowner /developer interest of the already-allocated Eddleston sites at Burnside and Bellfield, it would appear to be premature to place any reliance on the two additional identified 'alternative' sites in the village to contribute to housing during the Plan period. The potential flood risk issues are also noted. (112)</p> <p>The site is identified as having potential surface water hazard, a potential surface water flood risk; we recommend that this issue is taken forward through discussion with your flood prevention and roads department colleagues and Scottish Water, where relevant. Due to the steepness of the adjacent hill slopes we would also recommend that consideration is given to surface water runoff to ensure the site is not at risk of flooding and nearby development and infrastructure are not at increased risk of flooding. Foul sewage from this development should be connected into the SW public foul network (although the site is outwith the current sewered catchment). Failing that private sewage provision would be required although this could be challenging given the site location. The only possible discharge point would appear to be the Eddleston water for this scale of development. Further discussion would be required to determine whether such a discharge would be feasible in terms of the effluent standards required. All new developments should manage surface water through the use of Sustainable Urban Drainage Systems (SUDS). We would recommend that this requirement includes the use of SUDS at the construction phase in order that the risk of pollution during construction to the water environment is minimised. (119)</p> <p>Land West of Elibank Park, Housing 40 units (alternative): We note that at the northern boundary of this site, currently adjacent to the site allocation, there is an area identified as ancient semi-natural woodland on the AWI. We very much welcome that this is recognised in the site requirements and that it is required that a buffer area is created between the woodland and the site allocation. WTS would be able to advise on the size of the buffer when further plans are available for this site. If it is to be taken forward then we recommend that the site allocation boundary be reviewed for LDP2. (199)</p> <p>Development of the community of Eddleston which is easily accessible from Peebles, and to the North makes much more sense. Cardrona has taken some development pressure off Peebles for the last 20 years; Eddleston might do the same. I have no view on which of these two sites is preferable. But both have a pleasant South/South Easterly aspect. (206)</p> <p>This is a large and partially open site on undulating ground. The proposed density of development over the site is very low and it is unclear how the proposal would seek to integrate or respond to the settlement character and siting principles established within the existing village. If allocated, we advise that a design brief should inform what would be intended for the development layout. Existing features such as the</p> |
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| | | <p>hedgerow should be retained and appropriate improvements made to allow safe access to the rest of the settlement established. For example the provision of pavements along the main road and access connections from the site to and through Elibank Park to Station Lye should be established. (213)</p> <p>We do not believe AEDDL008 meets the criteria set out in Sections 5.10 and 5.14 that any proposals need to demonstrate 'existence of group of at least 3 houses' to satisfy criteria for submission. In addition, development of either site would require substantial supporting infrastructure changes within the village. Both sites are currently accessed from Old Manse Road/Meldons Road which becomes a single-track road as you leave the village at Elibank Park. This road is heavily used by both farm vehicles and forestry logging lorries. Development of either of these sites would require widening of Old Manse Road/Meldons Road to two lanes and installation of a pedestrian access to connect the new development(s) to the village. This would likely require the removal of beech hedgerow and felling of trees in Elibank Park to gain the width required. The new road would also need to be stabilised given the land falls away from the current road into Elibank Park. The current road access simply would not be suitable to cope with the additional traffic should these developments proceed. There is no mention of this in the MIR, only that pedestrian access would be required. The contributor has concerns about water run-off from development of site AEDDL008 and view that if the site was developed this would need to be addressed. The contributor states that during heavy rain water runs through the field into the bordering ancient woodland and across the road into Elibank Park. (237)</p> <p>With regards to AEDDL008, Alternative Option for Eddleston; I do not believe this option meets the criteria set out in Section 5.1 that any proposals need to demonstrate 'existence of group of at least 3 houses' to satisfy criteria for submission. AEDDL008 is outwith the village. The contributor has concerns with the alternative option for Eddleston AEDDL008 in terms of the increased flooding risk due to water run-off from any housing development at this site. AEDDL008 require services and pedestrian access from the village, and will require access onto the Meldons Road which is a minor single track road. (255)</p> <p>In terms of the Eddleston allocations, we would comment that given the lack of landowner /developer interest of the already-allocated Eddleston sites at Burnside and Bellfield, it would appear to be premature to place any reliance on the two additional identified 'alternative' sites in the village to contribute to housing during the Plan period. The potential flood risk issues are also noted. (317)</p> |
| Eddleston | AEDDL009 Land South of Cemetery | <p>The contributor states that development of this site this would cause the destruction of ancient pasture; increases the risk of pollution to the River Tweed and its tributary; will affect local wildlife and tourism; building has already taken place in the area, which will speed run-off during heavy rain, putting the area downstream at higher risk of flooding. The topography of Peebles and its environs mean the town and its transport links are very vulnerable. The B7062 is not suitable for large vehicles and in places is barely</p> |

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| | <p>wide enough for two cars. The A703 is still only a double track road that can be very fast and as the main route out of the Borders is very busy. The A72 is already busy and fast, it is frequently closed due to accidents, is narrow in places, causing bottlenecks and risking lives if emergency services need to get through. There is no alternative route. It is also vulnerable to flooding and risk of erosion by the Tweed, and development on agricultural land will exacerbate flooding. With the rise in the number of users on the A72 there will be an increase in the number of accidents particularly with cyclists. With the increase in population in the area, it will result in further stretching existing services and facilities including education. The proposal will also result in an increase in the number of houses, businesses and their occupants doing more journeys to get to work, shops, etc as there are limited facilities in the area thereby increasing our carbon footprint. The development on agricultural land used for food production is unwise and may impact on food security. (108 (2 of 2))</p> <p>All housing in Eddleston should be removed until you deal with the lack of provisions in the Schools, Doctors etc. (158)</p> <p>Concerns new developments could add to flood risk from increased surface runoff. The development would be very visible and 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. (46)</p> <p>Given the lack of landowner /developer interest of the already-allocated Eddleston sites at Burnside and Bellfield, it would appear to be premature to place any reliance on the two additional identified 'alternative' sites in the village to contribute to housing during the Plan period. The potential flood risk issues are also noted. (112)</p> <p>We require an FRA which assesses the risk from the Eddleston Water. Any nearby small watercourses should be investigated as there was a mill dam upslope of the site in the past to ensure there are no culverted watercourses through the site. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Due to the steepness of the adjacent hill slopes we would also recommend that consideration is given to surface water runoff to ensure the site is not at risk of flooding and nearby development and infrastructure are not at increased risk of flooding. The site is identified as having potential surface water hazard, a potential surface water flood risk; we recommend that this issue is taken forward through discussion with your flood prevention and roads department colleagues and Scottish Water, where relevant. Foul sewage from this development should be connected into the SW public foul network (although the site is outwith the current sewered catchment). Failing that private sewage provision would be required although this could be</p> |
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| | <p>challenging given the site location. The only possible discharge point would appear to be the Eddleston water for this scale of development. Further discussion would be required to determine whether such a discharge would be feasible in terms of the effluent standards required. All new developments should manage surface water through the use of Sustainable Urban Drainage Systems (SUDS). We would recommend that this requirement includes the use of SUDS at the construction phase in order that the risk of pollution during construction to the water environment is minimised. (119)</p> <p>Development of the community of Eddleston which is easily accessible from Peebles, and to the North makes much more sense. Cardrona has taken some development pressure off Peebles for the last 20 years; Eddleston might do the same. I have no view on which of these two sites is preferable. But both have a pleasant South/South Easterly aspect. (206)</p> <p>The site presents similar issues to AEDDL008. We highlight the potential for a planted linear path or green network along the dismantled railway to the east of the site and connecting to and through Elibank Park. We recommend that if both are to be allocated in the next LDP a planning brief for both sites should be prepared. (213)</p> <p>We do not believe AEDDL009 meets the criteria set out in Sections 5.10 and 5.14 that any proposals need to demonstrate 'existence of group of at least 3 houses' to satisfy criteria for submission. In addition, development of either site would require substantial supporting infrastructure changes within the village. Both sites are currently accessed from Old Manse Road/Meldons Road which becomes a single-track road as you leave the village at Elibank Park. This road is heavily used by both farm vehicles and forestry logging lorries. Development of either of these sites would require widening of Old Manse Road/Meldons Road to two lanes and installation of a pedestrian access to connect the new development(s) to the village. This would likely require the removal of beech hedgerow and felling of trees in Elibank Park to gain the width required. The new road would also need to be stabilised given the land falls away from the current road into Elibank Park. The current road access simply would not be suitable to cope with the additional traffic should these developments proceed. There is no mention of this in the MIR, only that pedestrian access would be required. (237)</p> <p>AEDDL009 require services and pedestrian access from the village, and will require access onto the Meldons Road which is a minor single track road. (255)</p> <p>In terms of the Eddleston allocations, we would comment that given the lack of landowner /developer interest of the already-allocated Eddleston sites at Burnside and Bellfield, it would appear to be premature to place any reliance on the two additional identified 'alternative' sites in the village to contribute to housing during the Plan period. The potential flood risk issues are also noted. (317)</p> |
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| Eddleston | General | <p>Again, Peebles is bursting at the seams. More consideration should be being given to other sites such as Eddleston where there is local infrastructure in place (Primary School) which is UNDER-utilised. (185)</p> <p>Eddleston currently has two allocated sites for housing development AEDDL002 and TE6B. Both of these sites are immediately adjacent to existing housing developments within the village and, therefore the development of these sites would require less infrastructure changes. These sites have been earmarked for development in the previous LDP but no development has taken place to date. The new plan adds three further sites which is a significant increase of more than 50%.The new plan (MIR) adds three further sites which is a significant increase. The MIR states in a couple of places that “it is not anticipated that LDP2 will require a significant number of new housing sites”, yet for Eddleston this could potential be increasing by more than 50%. Having 5 development sites identified for a small village seems excessive and if all were then to be developed, this would have a significant impact on the Eddleston village community. It is our view that the current two sites remain as the preferred development options (LDP sites AEDDL002 and TE6B) given that they are close to existing housing and would require less infrastructure changes. (237)</p> <p>The existing allocated sites AEDDL002 and TE6B should be prioritised for development. These are both immediately adjacent to existing housing developments within the village and as such would require less infrastructure changes. (255)</p> <p>I question why the land on the opposite side of the main road from AEDDL001 has not been considered. (283)</p> |
| Eddleston | SEDDL001 North of Bellfield II | <p>The contributor states that development of this site this would cause the destruction of ancient pasture; increases the risk of pollution to the River Tweed and its tributary; will affect local wildlife and tourism; building has already taken place in the area, which will speed run-off during heavy rain, putting the area downstream at higher risk of flooding. The topography of Peebles and its environs mean the town and its transport links are very vulnerable. The B7062 is not suitable for large vehicles and in places is barely wide enough for two cars. The A703 is still only a double track road that can be very fast and as the main route out of the Borders is very busy. The A72 is already busy and fast, it is frequently closed due to accidents, is narrow in places, causing bottlenecks and risking lives if emergency services need to get through. There is no alternative route. It is also vulnerable to flooding and risk of erosion by the Tweed, and development on agricultural land will exacerbate flooding. With the rise in the number of users on the A72 there will be an increase in the number of accidents particularly with cyclists. With the increase in population in the area, it will result in further stretching existing services and facilities including education. The proposal will also result in an increase in the number of houses, businesses and their occupants doing more journeys to get to work, shops, etc as there are limited facilities in the area thereby increasing</p> |

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| | <p>our carbon footprint. The development on agricultural land used for food production is unwise and may impact on food security. (108 (2 of 2))</p> <p>All housing in Eddleston should be removed until you deal with the lack of provisions in the Schools, Doctors etc. (158)</p> <p>Concerns new developments could add to flood risk from increased surface runoff. The development would be very visible and 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. (46)</p> <p>We require an FRA which assesses the risk from the Eddleston Water. Due to the gradients on site, the majority of the site will likely be developable. Consideration should be given to the lower parts of the site adjacent to the A703. Due to the steepness of the adjacent hill slopes we would also recommend that consideration is given to surface water runoff to ensure the site is not at risk of flooding and nearby development and infrastructure are not at an increased risk of flooding. The site is identified as having potential surface water hazard, a potential surface water flood risk; we recommend that this issue is taken forward through discussion with your flood prevention and roads department colleagues and Scottish Water, where relevant. Scots Pine Inn is noted as being affected by flooding in 1990 - no further details provided. Foul water must connect to the existing SW foul network. There are likely to be capacity issues at Eddleston STW for a development of this size. SW should confirm the situation. Private STW is unlikely to be accepted given the proximity of the foul sewer network. All new developments should manage surface water through the use of Sustainable Urban Drainage Systems (SUDS). We would recommend that this requirement includes the use of SUDS at the construction phase in order that the risk of pollution during construction to the water environment is minimised. (119)</p> <p>We are content with the principle of development on this site for our statutory interests. SEA: You have scored the potential impact of development of this site on Cultural Heritage as neutral. However, you have also identified mitigation measures relating to an Inventory designed landscapes. Additionally, the site requirements include archaeology evaluation / mitigation. This would suggest that some adverse effects are anticipated without mitigation measures in place, and consequently you may wish to consider revising the score for cultural heritage to reflect this. (164)</p> <p>This site is physically detached from Peebles and appears unlikely to be developable according to principles being established by the MIR, particularly in relation to sustainable places. If allocated and developed it may lead to further future development along this road, further establishing a sprawling development pattern of places that have little relationship to the town and which are heavily reliant on car</p> |
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| | | <p>use. (213)</p> <p>SEDDL001 is adjacent to AEDDL002 and the plan refers to this site only being developed if AEDDL002 is developed first. It is unclear as to why additional sites have been added whilst current sites have not been developed. (237)</p> <p>I feel that the other preferred site SEDDL001 and the existing allocated sites AEDDL002 and TE6B should be prioritised for development. These are both immediately adjacent to existing housing developments within the village and as such would require less infrastructure changes. (255)</p> |
| Ednam | AEDNA011, Cliftonhill (v) | <p>The contributor objects to the inclusion of the site within the Main Issues Report. (8, 9, 27, 28, 35, 41, 42, 61, 62, 71, 74, 77, 87, 89, 199, 289)</p> <p>The contributor supports the inclusion of the site. (86, 315)</p> <p>The contributor states that there are concerns regarding road safety and there are also wastewater infrastructure and road network constraints within the village. (8, 27, 28, 35, 42, 62, 71, 74, 77, 87, 89, 289)</p> <p>The contributor states the access for AEDNA013 is better than that of AEDNA011 and also makes reference to the refusal of a planning application on the site and questions why the site is being considered again. The contributor also states if properties are built on this land, who is to say that more properties would be built on the rest of the farm land area. (27)</p> <p>The contributor states there is already an existing undeveloped allocation within the village which is for sale. (27, 41, 89)</p> <p>The contributor states the views of Hume Castle from Cliftonhill should not be impaired by housing but should be protected. At present there are no street lights and no light pollution in Cliftonhill, which allows residents to enjoy the night skies. Lighting on a new housing estate at the back of our houses would ruin this. (28)</p> <p>The contributor states that Scottish Natural Heritage identify the Eden Water is a Special Area of Conservation. The contributor also states that SEPA identify the Eden Water as being subject to flooding in a 1:200 year flood event and when full it can result in flooding at the War Memorial. The contributor raises concerns with road safety within the village with narrow carriageways making the road unsuitable for significantly higher levels of traffic. There have been a number of recent accident including a lorry</p> |

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| | <p>crashing through bridge parapet. The contributor also states that Historic Scotland identify a number of features within and around Ednam which are of archaeological and architectural importance. The contributor also objects to the impact on wildlife/ecology (including European protected species) and the impact on landscape that would occur if this site was developed. The contributor also states there are better serviced settlements within the Central Housing Market Area for housing and the impact of development is unclear and therefore there are question marks over its deliverability and effectiveness. The contributor states that should the site be allocated they would expect the Council to request the following information: Archaeological investigation, Transport Impact Assessment, Landscape Visual Impact Assessment, Drainage Impact Assessment, Tree Survey, Design Brief, and Ecological Survey. (35)</p> <p>The contributor raises concerns in relation to wildlife on the site and the presence of protected species in the locality and states they should not be disturbed. (41, 61, 62)</p> <p>The contributors question the erection of a new fence along the site boundary of AEDNA011 and ask if the allocation of the site has already been agreed? (41, 87, 115)</p> <p>The contributor states there is a lack of facilities and amenities within the village. They also raise concerns about the footpath provision between Ednam and Kelso which is very poor and unsafe. Ednam would need to benefit from improved facilities to accommodate further housing development. (41, 89)</p> <p>The contributor states the existing land and the proposed site does not lend itself to housing. The site is situated at the bottom of a hill and would clearly suffer from water run-off. Although this can be engineered out, this would put added pressure onto the burn / ditch adjacent to the site that already floods frequently during heavy rain and when the River Eden is in flood. The earthworks alone required would suggest this site is not suitable and inhibitive for the proposed housing. (41)</p> <p>Contributor 61 raises several concerns with the proposed site. These include road safety issues and the increase in HGV traffic and accidents at this location. Contributors 61 and 62 both make reference to planning application refusal on the site (AEDNA011). The contributor asks why the site is being reconsidered when there has been no improvement in the village infrastructure. (61, 62)</p> <p>The contributor states the site has a steep slope which would result in properties being overlooked and significant surface water run-off. (71, 89, 289)</p> <p>There will also be a potential impact on the small watercourse adjacent to the development. (35, 62, 71,</p> |
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| | <p>89)</p> <p>The contributor raises concerns about flooding through the village. (8)</p> <p>The contributor does not feel that this site will provide affordable housing to support an ageing population which is what is needed. The contributor states that recent development in the area of Cliftonhill have been single, larger style properties which do not fit with the requirement for affordable property but are also out of character with the existing properties. A previous planning application (11/00750/PPP) was originally refused on the grounds that it was “inappropriate housing development in the countryside” and even though this was subsequently overturned by the Local Review Body they stated “<i>with the addition of the two new houses, it was the review bodies opinion that the group would be complete and that further development should be resisted</i>”. (71)</p> <p>The contributor states that The Old Smithy, which is a listed building, is adjacent to the proposed site and would be adversely affected by any carriageway changes. (71)</p> <p>The contributor states that previous planning applications have been opposed. The disturbance to wildlife would be irreparable. Building on this scale would interfere with wild animal transit corridors and disturb the small water course. (74)</p> <p>The contributor also raises concerns that the school does not have the capacity for more children and there is no mention of extending the school within the plans. (74, 77)</p> <p>The contributor states increasing the footfall within the area would raise the level of crime and light pollution from additional street lighting would be unwelcome. Also there is no brown bin collection available in the area therefore fly tipping and dumping would have an impact on the environment. (74)</p> <p>The contributor states that the broadband within Ednam is nowhere near the UK average with no plans to improve - current residents would be further disadvantaged with additional use on the line. Also the public transport within the village is practically non-existent. (74)</p> <p>The contributor objects to the potential allocation of 36 plus houses. This will change the character of the village beyond recognition. Currently the village has an established community composed of the main long term residents which has fostered a strong cohesive community that would be destroyed by such a disproportionate increase in housing stock. (77)</p> <p>The contributor questions the Council’s real intention in redefining the village as this appears to be a back</p> |
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| | | <p>door route to get around the overall development plan for the Scottish Borders. The village itself may have been zoned as suitable for residential development but not the agricultural land surround the village boundaries you are in effect changing the rules and as such your conduct is unreasonable and susceptible to judicial review. (77)</p> <p>The contributor states that the site shows good connection in terms of placemaking between Ednam and existing housing at Cliftonhill and the site is well located to provide a successful and sustainable area of growth for Ednam. The predicted 31% rise in the population over 75 will bring a requirement and demand for houses that are suitable for this age group. There will also be a need for housing that is suitable for starter homes, family homes and general market homes. The contributor states it is important to ensure that the village develops in a manner that will sustain and strengthen the community for the future. There have been two new houses recently built at Cliftonhill and the land owner has had expressions of interest from other young families wishing to live in the village. The contributor proposes a range of affordable housing, starter homes as well as mixed market houses with land available for organic allotments and an organic orchard. This we feel will help encourage sustainable living and re-establish a link between village living and local food production. Ednam has an active Church, village hall and there is capacity for more pupils in the primary school and nursery. The site is next to the bus stop with a regular bus service connecting the village to the town of Kelso and beyond. A modest increase in the population of the village that would be brought about by this development is important to revitalise and sustain the village bringing families back to Ednam to ensure that the services we have are maintained and enhanced by increasing demand. By prioritising smaller sites local builders would benefit rather than the national house builders that are required for large housing sites in the larger towns. The contributor provides further details in relation to development of the site including site access, public transport links, site infrastructure, landscaping and local education provision. The contributor has also submitted details about the site history in addition to details relating to the farm and business setup in support of allocating the site. The document also includes photographs of the site as well as example of eco-self-build properties, traditional play areas and organic allotments. The contributor confirms the site is in single ownership and is capable of delivery within the coming plan period (up to 2021). The contributor states that planning consent reference 04/02341/FUL at Ednam West Mains Farm has now lapsed. Also submitted is the Reporter's Findings of the Finalised Local Plan from May 1994 and January 2007 as well as financial details of holiday cottages used as part of a farm diversification scheme. (86)</p> <p>The contributor understands that the site is classed as prime agricultural land and asks how did this status change? (89)</p> <p>The contributor raises concerns in relation to wildlife on the site and road safety issues and the need for</p> |
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| | <p>significant improvements to road safety which would lead to more urbanisation of the rural surroundings. (41, 89)</p> <p>The contributor also states that pedestrian safety would be of great concern with a development of the size proposed – would the War Memorial and bus stop need to be relocated to accommodate a footway? (89)</p> <p>The contributors refer to the necessity to keep Cliftonhill and Ednam visibly separate. Two additional houses have been built west of Milburn and once included the proposed development could be classed as ribbon development merging Cliftonhill and Ednam village. Contributor 89 goes on to say at the meeting where approval was given for the two units it was stated this would be the last new building at Cliftonhill. At the same meeting it was also state the next land to be allocated for development in the area would be that adjacent to the new cemetery and there is no mention of that proposal. (41, 89)</p> <p>The contributor is sceptical that the site can accommodate 15 units. (41)</p> <p>The contributor considers Cliftonhill a rural locality rather than a village and would object to street lighting. (62, 89)</p> <p>The contributor states there are a number of sites around the Kelso area that have been available for some time and developers are not willing to develop the plots, despite recent more favourably market conditions, surely these pre-approved sites should be developed before the more obscure sites, as well as unplanned brown field sites within the town. Also as most of the sites closer into Kelso with much better road, public service and local services are not being developed, so to look to be developing a site with poor public service and few local amenities seems rather a bizarre choice. (115)</p> <p>The contributor refers to development of their own property and the restrictions that were put in place along the local road and asks if they have the capacity to safely get in and out. (115)</p> <p>The contributor has recently tried to have high speed internet up Cliftonhill in the form of fibre and land owners both sides of the road have objected and we are currently in a standoff. (115)</p> <p>The contributor states that Ednam is lacking affordable housing however a site such as this is unlikely to provide said housing due to the high land prices that will be demanded and also such occupiers are going to be more reliant on public services that are poor in the village. There are a number of sites around Kelso that have been available for some time and developers are not willing to develop the plots despite</p> |
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| | <p>more favourable market conditions, surely these pre-approved sites should be developed before the more obscure sites, as well as unplanned brownfield sites within the town. (115)</p> <p>The contributor requires a Flood Risk Assessment which assesses the risk from the small watercourse which flows adjacent to the site and enters the Eden Water. Consideration will need to be given to bridge and culvert structures within and adjacent to the site. Review of the surface water 1 in 200 year flood map and steep topography indicates that there may be flooding issues at this site or immediately adjacent. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Site will need careful design to ensure there is no increase in flood risk elsewhere and proposed housing is not affected by surface runoff. Any foul water must connect to the existing SW foul network. The pump station at Ednam may require to be upgraded to account for the proposed developments, this should be confirmed with Scottish Water. The contributor states that the site is close to a tributary of the Eden Water at the north western side. This should be protected and enhanced. The contributor advises that the site has a potential surface water hazard and water environment considerations. (119)</p> <p>The contributor states that at the moment the site boundary is allocated on an area of woodland identified on the Native Woodland Survey for Scotland. Therefore the contributor does not support this site allocation, and strongly recommends that this alternative option is not carried forward to LDP2. <i>Note: Contributor 199 has referred to this site as AEDNA001.</i> (199)</p> <p>The contributor requests the site is not included in the LDP as the previous planning approvals have suggested that no further application would be considered for Ednam. The contributor also states there are no facilities or services to support further development and there are no plans to improve broadband in the village. There are a number of individual developments that have already happened in close proximity to this site over recent years which are inappropriate to the provision required but given that these have already taken place it feels inappropriate to consider further development in this area. (289)</p> <p>The contributors raise concerns that agricultural land is being developed and asks why the land is being considered for development following a planning application refusal on the site. (319)</p> <p>The contributor states the area detailed in the MIR shows good connection in terms of placemaking between Ednam and existing housing at Cliftonhill and the site is well located to provide a successful and sustainable area of growth for Ednam. The predicted 31% rise in the population over 75 will bring a requirement and demand for houses that are suitable for this age group. They will need to be sustainable and efficient in terms of energy and space and be in communities that have access to the services and activities required to keep the population fit and active. Ednam is such a village. To ensure that there is a</p> |
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| | | good mix of demographics there will be a need for housing that is suitable for starter homes, family homes and general market homes. (315) |
| Ednam | AEDNA012, Land east of Keleden | <p>The contributor objects to the non-inclusion of this site (AEDNA012) and considers it more suitable for development than the alternative option AEDNA011. The contributor states AEDNA012 is on higher ground and not at flood risk. The contributor has only proposed development at the top half of the site where the land is higher. The contributor states that SEPA confirm the top half of the site is not in the flood risk area but states the Council have written off the whole site.</p> <p>The contributor states the site has excellent road visibility and the site would have a backdrop of land to camouflage the properties. The site is not visible on the skyline unlike AEDNA011. The site is not on arable farmland and infrastructure for the site is in place.</p> <p>The contributor makes reference to a Local Review Body meeting held on 16.04.18. At this meeting the contributor states that it was agreed the development boundary for Ednam would be moved as per the plan submitted by the contributor as part of their submission. (9)</p> |
| Ednam | AEDNA013, Land north of Primary School | <p>The contributor objects to the inclusion of the site within the Main Issues Report. (8, 41, 42, 61, 62, 72, 74, 77, 89)</p> <p>The contributor considers this site to have better access than AEDNA011. (27)</p> <p>The contributor states that there are concerns regarding road safety and there are also wastewater infrastructure and road network constraints within the village. (8, 42, 62, 72, 74, 77, 89)</p> <p>The contributor states that while this site would still alter the feel of the village enormously it would at least be on the same side of Duns Road as the school, football pitch and play park. The contributor considers this to make more sense with a view to family homes being built. (35, 61)</p> <p>The contributor states there are a lack of facilities and amenities within the village. Also the footpath provision between Ednam and Kelso is very poor and Ednam would need to benefit from improved facilities to accommodate housing development. (41, 89)</p> <p>The contributor raises concerns that their property would be completely spoilt by the development. (42)</p> <p>The contributor considers any further development in Ednam unjustifiable due to a lack of services and facilities. However they consider this site the more suitable of the two proposed in the Main Issues Report. The contributor raises concerns regarding access from the site onto the B6461, although states</p> |

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| | <p>this could be overcome by extending the speed limit zone. (61)</p> <p>The contributor raises concerns along the B6461 which is already busy and runs adjacent to the local Primary School making it a potential danger. (62)</p> <p>The contributor considers Cliftonhill a rural locality rather than a village and would object to street lighting. (62)</p> <p>The contributor states that the site is often under water which then flows into the back gardens of properties along Stichill Road. The contributor questions what will happen when houses are there, where will the water flow to then....into the houses? While the contributor realises that more houses/flats are needed they are worried that a sudden build up would not be a good idea. (72)</p> <p>The contributor states that previous planning applications have been opposed. The disturbance to wildlife would be irreparable. Building on this scale would interfere with wild animal transit corridors and disturb the small water course. (74)</p> <p>The contributor also raises concerns that the school does not have the capacity for more children and there is no mention of extending the school within the plans. (62, 74, 77)</p> <p>The contributor states increasing the footfall within the area would raise the level of crime and light pollution from additional street lighting would be unwelcome. Also there is no brown bin collection available in the area therefore fly tipping and dumping would have an impact on the environment. (74)</p> <p>The contributor states that the broadband within Ednam is nowhere near the UK average with no plans to improve - current residents would be further disadvantaged with additional use on the line. Also the public transport within the village is practically non-existent. (74)</p> <p>The contributor objects to the potential allocation of 36 plus houses. This will change the character of the village beyond recognition. Currently the village has an established community composed of the main long term residents which has fostered a strong cohesive community that would be destroyed by such a disproportionate increase in housing stock. (77)</p> <p>The contributor questions the Council's real intention in redefining the village as this appears to be a back door route to get around the overall development plan for the Scottish Borders. The village itself may have been zoned as suitable for residential development but not the agricultural land surround the village boundaries you are in effect changing the rules and as such your conduct is unreasonable and</p> |
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| | | <p>susceptible to judicial review. (77)</p> <p>The contributor states there is already an existing undeveloped allocation within the village which is for sale. (27, 41, 89)</p> <p>The contributor raises concerns about flooding through the village. (8)</p> <p>The contributor advises that the site has water environment considerations. The foul water must connect to the existing SW foul network. The pump station at Ednam may require to be upgraded to account for the proposed developments. This should be confirmed with Scottish Water. (119)</p> |
| Eshiels | AESHI001, Land at Eshiels III | The contributor has submitted a site (AESHI001) for consideration as a potential housing allocation. (267) |
| Galashiels | (AGALA029) Netherbarns | <p>The contributor, acting on behalf of M&J Ballantyne Ltd, note that the 2017 Housing Land Audit highlights a lack of new sites within Galashiels, with capacity for only 32 dwellings having been added within the past 5 years.</p> <p>In addition to this within the Main Issues Report there are still no preferred residential housing sites for Galashiels, with Netherbarns only being listed as an 'alternative'.</p> <p>Galashiels is the Borders major commercial centre as well as educational centre being home to Heriot-Watt University's School of Textiles and Design and the main campus of Borders College. In addition, Galashiels train station gets to Edinburgh in 50 minutes making it a popular location for commuters. Indeed, the Proposed Strategic Development Plan confirms (Para 3.31) that "<i>In Galashiels, Tweedbank and neighbouring communities, the Borders Rail line provides further opportunities to connect and grow communities.</i>"</p> <p>On this basis it follows that Galashiels should be a target for new housing development, in close proximity to services, transport modes and an expanding employment base.</p> <p>Currently within the Scottish Borders there is an overreliance on a historical and ineffective housing land supply to meet the Council's housing land requirements. In addition, whilst the contributor appreciates the integration of new sites through the Main Issues Report and through the Housing Supplementary Guidance do not provide a range and choice of viable land for housing in locations where the market wants to deliver, and most importantly do not provide development opportunities for Galashiels.</p> <p>Netherbarns represents an effective site which is free from constraints and would be delivered in the early</p> |

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| | | <p>years of the 5 year-plan period. The site is in the sole ownership of the contributor's client, a local builder that has a proven and ongoing track record of delivering family homes within the Scottish Borders.</p> <p>Previously concerns have been largely about impacts on Abbotsford but through a previously provided Heritage Statement, with sympathetically designed planting it has been established that these concerns have been addressed through mitigation.</p> <p>In addition, Netherbarns is surrounded on three sides by development, presenting an opportunity for appropriate rounding off of the settlement boundary and providing a medium capacity site for Galashiels which is currently not available elsewhere within the town. Given the support shown by the Council and the consultees the site should be presented as a new allocation for residential development within the proposed Local Development Plan.</p> <p>In support, the contributor has submitted plans detailing the evolution of the proposal and a proposed site plan along with a Heritage Statement, Landscape and Visual Assessment and updated Landscape Photography which have been submitted previously. Information included within these statements includes the following points:</p> <ul style="list-style-type: none"> • In respect of site context, a timeline of the key stages of the promotion of the site is included. The contributor notes that the timeline shows that the site's allocation for residential development has continuously been supported by officers and members of the Council with various iterations of development proposals being considered through successive development plans. Throughout this process the proposals have changed in response to comments made by DPEA Reporters, Council Officers' assessments and past objectors. The efforts made by the owners to address any negative impacts upon Abbotsford and respond to any perceived shortcomings of the site are evident. • In respect of effectiveness and delivery, the owner proposes a programme of advance planting to strengthen the established landscape framework and introduce significant areas of new landscape features. Details of this planting strategy are contained in the submitted Landscape and Visual Appraisal, which shows the existing landscape and the extent of proposed new planting. • The site would be developed over a 24-month period post-grant of planning permission. Assuming 12-24 months to achieve the necessary consents, the site could be delivered in full within the first 5 years of the plan period. • In respect of accessibility, the site is within walking and cycling distance to the wide range of shops and services within Galashiels town centre which supports sustainable methods of transportation. Vehicular access is available via an existing road junction. • In respect of Heritage, Design and Visual impact, Abbotsford House and the protection of it and its grounds has been a repeated consideration in assessments of the Netherbarns site. Concerns over |
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| | | <p>setting of the listed asset have already seen the proposals reduced from 91 dwellings to approx. 45 with carefully considered planting and design parameters set in a bid to be sensitive to the surrounding area. The Heritage Assessment has been informed by the Landscape and Visual Assessment (LVA) and confirms that, while the introduction of further housing will result in a very slight change to part of the setting of Abbotsford, the resultant situation will be characteristically similar to the existing and, overall, the nature of change to the setting will be neutral. No harm would be caused to the special interest of the Category A listed Abbotsford House or the values of the Designed Landscape. The Landscape and Visual Appraisal shows that glimpsed views could potentially be eliminated by year 15 through sensitive materials and established landscaping. During the summer, the new houses will be entirely screened by the existing trees along the bank of the river and those within the parkland on the Abbotsford side. Throughout these months, there will be no change to the setting of Abbotsford. Whilst there would be a minor change to the setting of the listed Netherbarns and Kingsknowes through the development of the site for residential use, it would not affect the special interest of the listed buildings. This reflects that the historic and architectural interest of the farm and Kingsknowes lies predominantly in the building fabric and also the scale of change in the surrounding area, including the construction of the A7 and the development of the bungalow and housing estate. The special interest of the heritage assets would be preserved. The LVA provides guidance on design matters including a high-level masterplan for the site. The lower levels of the site which are more sensitive to the view from Abbotsford House will be free from residential development and will provide open space for the new homes. Development would be focussed on the north western and western portions of the site where existing and enhanced screening will mitigate views into the site.</p> <ul style="list-style-type: none"> • In respect of landscape and visual appraisal, the LVA proposes reinforcement of the woodland belt along the southern boundary as recommended by Scottish Borders Council, and the inclusion of a notable proportion of evergreen tree species, combined with the promotion of further tree cover to proposed street frontages and to the northern boundary, which will create tiered year-round screening of the proposed development. The proposals would complement the Abbotsford Landscape Management Plan (ALMP) which proposes felling and restocking of parts of the mature tree belt beyond the south-eastern side of the site. This process would temporarily open up views both into the site and beyond to existing properties at Netherbank. The proposed planting detailed in the LVA will mitigate this effect to the benefit of views from Abbotsford. • It is submitted that the impact of new properties within the site can be adequately mitigated and that betterment can be achieved when considering longer views from Abbotsford toward Netherbarns through additional screening. (129) |
| Galashiels | (AGALA029) Netherbarns | The Abbotsford Trust objects to the development of the Netherbarns site because the associated light, sound and visual intrusions will impact adversely on its heritage assets, historic setting and cultural |

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| | <p>landscape of Sir Walter Scott and the Scottish Borders. The Main Issues Report (MIR) puts forward a commentary which suggests that these adverse impacts can be mitigated by screening of the site by trees.</p> <p>The Abbotsford Trust strongly opposes the assumption that screening with trees will reduce the impact of the Netherbarns site: it believes that an adequate level of tree screening – one which protects the setting of Abbotsford from any new development – is unachievable on this site.</p> <p>Furthermore:</p> <ol style="list-style-type: none"> 1. The Historic Settings paper by the developer makes inaccurate and uninformed assumptions thereby misinforming the whole proposal and the MIR. The most damaging claim is that the boundary of the designed landscape is the River Tweed. It is not – the boundary is the northern edge of the Trust owned trees on the northern bank of the River Tweed, which reaches to the roadside. Therefore at places the designated designed landscape is contiguous with the development site. 2. It is important to point out that the majority of the current screening is actually provided by tree regeneration on the disused railway, and that this land is neither owned nor managed by the Netherbarns site nor the Abbotsford Trust, and therefore cannot be considered as playing a role in the screening of the site. 3. The additional screening by trees on the site is presented by the developer without any reference to the layout of the houses themselves. This is misleading as the screen and its position in relation to the houses is central to the consultation. 4. The overall design and detail as found in the ‘Design Code’ document and the ‘Design Response’ document uses a language which is open to ‘interpretation’ and is not illustrated by relevant visual examples. 5. The proposal is for 45 houses to be placed on only half the site. This allows for a potential doubling of the number of houses in the future. The fact that the developer submission is only for half the site is not made clear in the MIR. <p><u>A. Screening of the site by trees</u></p> <p>The current fragility and narrowness of The Abbotsford Trust’s woodland on the bank of the Tweed does not provide an adequate screen now, and it is one which is deteriorating year on year. Photos showing the deterioration of the screen where fallen trees have left gaps are submitted.</p> <p>The Trust state that there are real challenges as to how to sustain continuous woodland cover on this banking. The Trust are of the view that the woodland screening in the visual analysis supplied by the developer in the Landscape and Visual Appraisal (Brindley Assoc. July 2017) is misleading and is presented without an explanation. It relies on the screening provided by trees in the area of the disused</p> |
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| | | <p>railway line between the Abbotsford Trust boundary and the Netherbarns site, and therefore should not be considered a part of the woodland screening which mitigates the development of Netherbarns as it is neither under the management nor influence of either owner. In contrast, Abbotsford's screening is very weak, providing very thin cover compared to the trees beyond the road. Photos are submitted showing the weakness of the screen.</p> <p>The new tree screens on the Netherbarns site itself are totally inadequate for the height, quantity, density, arrangement and type of housing proposed, and will not screen most of the details laid out in the Design Code supplied by the developer.</p> <p>The new tree screens proposed will in themselves damage the historic setting of Abbotsford, as their character and makeup is at odds with the designed landscape, and they will never provide enough screening to mitigate the adverse effects of the proposed development, even if greatly increased:</p> <ul style="list-style-type: none"> • They are too linear, too narrow, with too many straight lines. • They contain an inappropriate mix of trees for the character of the setting. • They are inappropriate to Scott's woodland compartments which have sinuous outlines, cover 50% of the ground, and are almost wholly deciduous. • At best the proposed linear plantings might thinly grow to become incongruous in the designed landscape setting of Abbotsford and indeed in the field patterns of the Tweed valley generally, and provide little screening. • At worst they will fail to establish and have no role in screening parts of the new development. • Strips of trees, or even small clumps, cannot be managed over time for continuous cover woodland. <p>The reality of global warming is now upon us and needs to form part of the discussion for LDP2 and its use of trees as a mitigating factor.</p> <p>The MIR uses an argument that the Abbotsford Trust is not active in winter so the lack of a screen in winter does not matter:</p> <ul style="list-style-type: none"> • It is inappropriate for the MIR consultation to assume that the Abbotsford Trust will not be undertaking core activities to draw visitors to the site in the winter or in darkness in the future, indeed, quite the opposite is true • The designed landscape at Abbotsford is open to the public 24/7 • What are the precedents for protecting the setting of a schedule A historic site in some seasons and at some times of the day, but not others? • The submission by the developer fails to consider the setting of Abbotsford and the wider cultural landscape, and only considers the impact of the Netherbarns development via views from Abbotsford |
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| | | <p>House.</p> <p>In conclusion, the Abbotsford Trust objects to the inclusion of the Netherbarns site in the LDP2 due to the use of screening by trees being presented as the key mitigating factor. Tree screening does not and cannot in the future limit the intrusion of lights, sound and the adverse visual effects of a development on the individual assets (house, gardens and estate and all its associated built and designed features), the historic setting of Abbotsford, and on the wider cultural landscape.</p> <p><u>B. Environment of Abbotsford has become a major public amenity</u></p> <p>There has been a material change at Abbotsford since the Netherbarns site was dismissed from the LDP1, in the form of an extensive programme of woodland management in the designed landscape, which concluded in 2018. The result of this has been to open up a new path network throughout the site which affords new views through the woodland, across the Tweed, and to the landscape beyond, e.g. the Netherbarns site. This has come about through a combination of funding and private donors who recognise the extraordinary importance of the Trust owned land alongside the River Tweed for its biodiversity, its public amenity, and its historic significance. In addition, the restoration of the picturesque landscape from the house down to the River Tweed has created a new woodland planting which will frame views from the North Terrace and main rooms of the house down to the Tweed and directly across to Netherbarns, reflecting closely the original intent of Sir Walter Scott to create a natural looking wooded landscape with widespread grassy ‘parks’.</p> <p>As a result of these changes Abbotsford now attracts a greatly increased number of walkers.</p> <p><u>C. Scott’s ideas on landscape and place were made manifest at Abbotsford and were central to the development of the cultural movement of Romanticism</u></p> <ol style="list-style-type: none"> 1. The landscape, garden and house are as much a part of Walter Scott’s artistic output as his novels, but they are unique and fragile. Scott recognised that ‘his oaks would outlive his laurels’, e.g. that the landscape would be more precious and loved in the future than his books. 2. Scott designed Abbotsford as a wrap around, immersive, world-within-a-world which displays all the core tenets of the Romantic movement. 3. He created a place for people to experience, to dwell in, and to discover, relying on the stimulation of sight, sound, and scent to lead one into the wonders of nature. 4. Abbotsford was designed as a place of stories where people can find the roots of their cultural identity – from the Abbots Ford to Rhymers Glen to Turnagain. 5. At Abbotsford, Scott created a naturalistic landscape which was his inspiration and he wrote about the way in which the green space, with its sensory quietude, gave him a sense of wellbeing and an |
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| | | <p>'elasticity' of mind essential for his creativity.</p> <p>The adverse impacts of the Netherbarns development will change the way in which nature is experienced at Abbotsford and will change Scott's legacy forever. The Abbotsford Trust is currently exploring the profound impact that Abbotsford as a place can have on people in its 'Learning in a Heritage Landscape' project, which aims to help disadvantaged young people find a sense of self and the skills with which to propel themselves into a fulfilling future. The reduction in the quality of the historic setting of Abbotsford through the development of Netherbarns will undermine these aims to continue Scott's legacy of encouraging healthy, elastic, creative minds.</p> <p>Abbotsford still evokes much of the atmosphere which Scott intended through his designs. Abbotsford is a rare and precious place which engenders in people peace, tranquillity, a sense of belonging, and a broader perspective on life: it needs to be protected.</p> <p>Since the woodland restoration, Abbotsford has become an important community asset for Galashiels, Tweedbank and beyond. This is clearly evidenced in the huge uplift in numbers of walkers using the new path network and in fact that over 1000 people visited Abbotsford on the recent open day in December 2018. The community clearly welcomes Abbotsford's efforts to show its relevance to their everyday lives, embracing the opportunities this extraordinary place affords.</p> <p><u>D. Development will compromise approaches to Abbotsford by foot</u></p> <p>The approaches to Abbotsford on foot are becoming increasingly well used by first time visitors to the site. However, there are regular comments made to the reception staff that the walk from Tweedbank Station to Abbotsford is disappointingly suburban in character. As a result, walkers are directed back to the station on the stretch of the Borders Abbey Way which runs along by the River Tweed to Lowood Bridge. The designed landscape at Abbotsford is crossed by two increasingly important long-distance walking routes – the Borders Abbey Way and the Southern Upland Way. In the case of the latter, the walker will have to negotiate the western boundary of the Netherbarns housing development to get to the River Tweed. The Borders Abbey Way takes two routes which afford views across Abbotsford directly into the site at Netherbarns, where on a good day the south sloping site is lit up by sun from morning to early evening. Other walks from vantage points on the wider estate pick up on the same view into Netherbarns.</p> <p><u>E. Why the topography of the Netherbarns site is so detrimental to Abbotsford</u></p> <p>The Abbotsford Trust is very familiar with the site at Netherbarns. Its topography slopes down towards Abbotsford from the A7, thus increasing the visual impact of every single unit which might be built.</p> |
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| | | <ul style="list-style-type: none"> • Each house will be partially visible from Abbotsford because of this slope. • The topography of the slope and banking is mirrored on both sides of the Tweed. Thus, the windows of the houses at the lowest level of Netherbarns will be eyeball to eyeball with Abbotsford's windows. • The rest of the development will have the effect of bearing down on the historic setting. • Garden 'enhancements' are likely on a southerly facing sloping plot, including terracing, decks, paths, conservatories, ramps and steps and associated lighting and furniture. All would increase the visual and sound intrusion of the basic development at Abbotsford. • Reflections from glazing creating a daytime reminder of the suburban intrusion of a new development which can be seen through trees in summer or winter. The site faces south east and therefore all windows will reflect back towards Abbotsford. The likelihood of this will be increased by new extensions, conservatories, greenhouses and solar panels and parked cars. • Noise intrusion on the setting of Abbotsford. It is not decreased by a woodland screen and is amplified by water, e.g. the River Tweed. Even though it cannot be seen, noise will gather force depending on the number of housing units built. • Lighting intrusion on the setting of Abbotsford will come from many sources associated with development – car headlights, street lighting, porches, undraped windows but also security lighting to the back and front of properties. All lighting is visible through trees, whether in summer or winter. <p>Furthermore, these intrusions will adversely affect Abbotsford in the following ways:</p> <ol style="list-style-type: none"> 1. Seriously damage the integrity of Abbotsford's setting, which will damage tourism in the Borders, with a long term adverse effect on bringing wealth and business to the area. It is the Borders' most outstanding and internationally important tourist attraction. 2. Undermine Abbotsford's fundraising abilities to protect and conserve the legacy of Scott, and thus adversely affect its importance to the Borders' tourism and economic wealth. 3. Impact on Abbotsford as an amenity for the local community. Recent grants have developed the estate for access, biodiversity, and to conserve its designed landscape. Currently Abbotsford's 'Learning in the Historic Landscape' project focuses on employability and skills for young people. 4. Adversely affect tourism and jobs in the Borders – Abbotsford is a key employer in the Central Borders and employs 38 staff, supported by over 100 volunteers, many of whom are volunteering as a springboard into employment. 5. Undermine the previous significant public investment in Abbotsford (£1.5 million by SBC itself) as a tourist destination with its new Visitor Centre and restoration of house. The gothic Pavilion in the walled garden is attracting further investment to restore it by 2020, complementing the new 'all access' garden paths as a place for shelter and repose. |
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| | | <p>6. Critically weaken future plans for Abbotsford to be recognised as a World Heritage site.</p> <p>Abbotsford is one of Scotland’s most important cultural assets and should not be diminished by a development of houses at Netherbarns, which will impact on Abbotsford’s house, gardens and designed landscape. It would be ironic if, as we approach Scott’s 250th anniversary and with the eyes of the nation upon us, diggers were to greet visitors across the Tweed. (310)</p> |
| Galashiels | (AGALA029) Netherbarns | <p>The contributor does not believe the developer’s proposed improvements amount to more than tinkering with the deeply flawed proposal (same number of houses) which was dismissed outright in 2014. It is therefore astonishing that planners have allowed their interest in the site to be re-awakened, especially when a much lesser scheme of twelve houses maximum was dismissed at the same time.</p> <p>If the present proposals are allowed then future generations will question how a civilized country could ever have allowed a suburban development to be built, as I once heard it described, “smack in the face of a national treasure.” Forty-five houses, or even half the number, would inevitably constitute a suburban development which could not but damage the setting and experience of Abbotsford.</p> <p>Even if partially screened, the development of forty-five houses at Netherbarns would give the overall impression of a suburban development. As well as the actual buildings; vehicles and roads, street lights, noise and light would all be much more noticeable than the existing field, unavoidably adding to the suburban effect. To quote again from Reporter Richard Hickman’s 2007 findings, “... <i>this is a particularly sensitive landscape, where even a very minor intrusion of alien elements is likely to mar the perceived experience of visitors, many of whom will have travelled a great distance to visit Abbotsford, with correspondingly high expectations.</i>”</p> <p>The contributor does not accept planner’s view that material changes would allow the development of forty-five houses at Netherbarns without significant adverse effect on Abbotsford and its designed landscape. On the contrary, given the uncertain state of the major tree screen along the riverside, and the new breadth of visitors’ experience at Abbotsford, the contributor now believes that such development is potentially more damaging than ever, and the contributor strongly objects to it.</p> <p>The contributor therefore respectfully requests that the current proposal be removed from the draft plan. The contributor would not object to development at Netherbarns if it were restricted to the alternative proposal set out below:</p> <p>By contrast with the proposed allocation of forty-five units, a modest level of development, made up of a few houses and some really worthwhile areas of new woodland could give the overall impression, not of a</p> |

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| | | <p>partially screened suburban development, but of a handful of houses in a wooded landscape. This is a crucial distinction which the contributor believes should govern any future plans for development of the site. This approach could minimise damaging impacts on Abbotsford, and, if the woodland is properly planned, mitigate the negative impact of existing development nearby. The contributor is mindful that in 2014 Reporter Richard Dent rejected a similar proposal with a maximum of twelve houses. Clearly the number would depend on various factors, including house type. Given the topography of Netherbarns, it would be much easier, both in terms of groundworks and of visual impact, to accommodate low buildings of shallow depth, perhaps of cottage style (not bungalows).</p> <p>The Countryside Around Towns policy (CAT) is about preventing inappropriate creep of development into the countryside. While the CAT policy itself may be up for amendment as part of the Local Plan process, development at Netherbarns would be completely at odds with the intentions of the policy.</p> <p>The contributor is strongly of the view that the development of the site would be undesirable because of the potential risk of damage to very important landscape, historic, and cultural interests, and to the contribution of tourism to the Borders economy. (313)</p> |
| Galashiels | AGALA029 (Netherbarns) | <p>The contributors object to this site for housing development. The contributor concurs with the submission made by The Chair of the Board of Trustees of The Abbotsford Trust and would add the following:</p> <ul style="list-style-type: none"> • Abbotsford is a unique and historic literary house and as such attracts visitors from all around the world. In addition to their wish to visit the house built by Scotland's greatest-ever writer, what attracts them is the overall environment and ambience of the estate and the landscape and its sense of peace and tranquillity. What they experience is, of course, what Scott intended - a sanctuary for a writer, a place to reflect on history and philosophy. This has always been felt within the confines of the walled gardens, the surrounding woodlands, and the aspect to the north of the house, facing as it does, the Tweed and the Border hills and meadows beyond. With the recent development of the pathways and woodland towards the river, this aspect of visiting Abbotsford has been enhanced - it is greatly appreciated both by visitors and locals as an area of outstanding beauty and tranquillity. There is no doubt that a housing development at Netherbarns, being directly across the river, and in full view of Abbotsford, would seriously diminish the peace and enjoyment for many. (39) • Over the past year the contributor has contributed to a new development at Abbotsford - tours around the gardens, not primarily to talk about horticultural matters, but to describe the vision behind Scott's plans and layout. An important component of the tour is to conduct visitors to the north terrace (i.e. facing the Tweed). For Scott, this was a Picturesque Landscape (Picturesque: an aesthetic ideal pioneered in 1782 by William Gilpin, combining the beautiful and sublime in landscape) and he developed that area having been influenced by that artistic movement. That is another reason why a housing development right in the middle of it is inappropriate. But more than that, Scott suffered bouts |

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| | | <p>of depression and found succour in contemplating landscape in general, and his Picturesque Landscape in particular. Abbotsford has already discussed (with Visit Scotland for instance) promoting that aspect; that is, its attraction to visitors in general, and to special groups in particular. The special groups would include visits from residents of care homes, individuals with learning difficulties and so on. This is the concept of "nature as nurse", or "the therapeutic landscape", increasingly important in the non-pharmaceutical treatment of mental disorders. It is stressed that this initiative would be seriously hampered with the development at Netherbarns. (39)</p> <p>The contributor is a retired Family Doctor with a particular interest in mental health therapies. That experience leads the contributor to believe that Abbotsford has a pioneering role to play in the Scottish Borders in what is described above. The preservation of the pastoral environment in and around Abbotsford is of crucial importance – housing development at Netherbarns would be highly detrimental. (39)</p> <p>Oppose any development at this location, it would seriously impact upon Abbotsford – one of the major tourist attractions in the Borders. (58)</p> <p>Contributor is strongly opposed to this site for the following reasons:</p> <ul style="list-style-type: none"> • The issue cannot be reduced to being just about the views, seasonal or otherwise, from Abbotsford House. Protecting the setting of Abbotsford is about more than just hiding a housing estate behind curtains of tree planting along the south-eastern boundary of the site. (60, 120, 121) • The setting would still be shamefully compromised – for visitors, including those heading for the Eildon and Leaderfoot National Scenic Area, arriving along the A7 from the Selkirk direction; from the historic designed landscape and its footpaths, now enjoyed all year round by increasing numbers of walkers and visitors to Abbotsford and from the surrounding hills. (60, 68, 120, 121) • The contributor is exasperated that the Council and the Developer/Owners are once again pursuing the idea of suburban development at Netherbarns – which has four times in the last twelve years been found against at Public Inquiry/Local Plan Examination. (60, 120, 121) • It is inappropriate for Galashiels to spread further over the Kingsknowes ‘shoulder’ into land associated with the Area of Great Landscape Value and further upstream in relation the Tweed, which is not the natural water valley of the town. (60, 120, 121) • A housing estate would be inappropriate in character and scale, however, a small, landscaped build of just several houses with associated features, such as orchards, woodland or stables, would provide a softening of the town’s present hard edge at Kingsknowes – and an appropriate, irrevocable transition between town and countryside. (60, 120, 121) • The contributor believes that the conclusions of the last public inquiry remain definitive: “Despite the |
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| | | <p>lack of a formal objection by Historic Scotland, I concur with the conclusions reached at the previous local plan inquiry. It appears to me that cultural and landscape considerations combine to provide an asset which should remain free of the impact of the suggested allocation and any subsequent development of Netherbarns. I do not accept that the woodland screening would adequately mitigate the adverse impacts of the allocation on the setting of the house or the designed landscape. Additionally, the re-opening of the railway link to Galashiels is likely to increase the volume of visitors to Abbotsford, therefore further strengthening the need to protect the heritage of the vicinity.” (60, 120, 121)</p> <ul style="list-style-type: none"> • The contributor (Save Scott’s Countryside) has plans for a nationwide competition for a masterplan for Netherbarns to be launched in the event that the site is allocated for modest development as outlined above. The aim would be to find a resolution to the long-running Netherbarns saga, enabling some development on the site while providing substantial areas of tree-planting to ensure minimum negative impact on Abbotsford House and its Designated Landscape. The competition would be open to all those involved in both architecture and in landscape, whether at professional or student level. The organisers would wish to work with SBC and others to ensure that the maximum amount of relevant material is available to contestants. The contributor would wish to work closely with Abbotsford so that contestants may be further informed about Abbotsford and allowed access as appropriate. The competition would be designed to highlight Scott’s importance as a pioneer in landscape design. To be absolutely clear, this competition would only be launched in the event of Netherbarns being allocated for modest development. (60) • Development on the site would be contrary to: <p>Scottish Planning Policy 2014, Policy Principle 137 – ‘The planning system should promote the care and protection of the designated and non-designated historic environment (including individual assets, related settings and the wider cultural landscape) and its contribution to sense of place, cultural identity, social well-being, economic growth, civic participation and lifelong learning’. (68)</p> <p>Managing Change in the Historic Environment: Designed Landscapes 2016 – Inventory sites often have a planned relationship with landscape features beyond their boundaries, and these surroundings may contribute to the way they are experienced, understood and appreciated. Land outwith the boundary may provide a backdrop to a mansion house or terminate a vista. This ‘borrowed’ land may therefore impact on the site’s setting – for example, if it would affect a deliberately planned outward view. Proposals should be carefully designed and located to minimise any such impacts’. (68)</p> <p>Scottish Borders Local Development Plan 2016, Policy EP10 Gardens and Designed Landscapes (nb the submission refers to LDP 2015 Policy BE3 in error) – ‘Development will be refused where it has</p> |
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| | | <p>an unacceptable adverse impact on the landscape features, character or setting of 1. Sites listed in the Inventory of Gardens and Designed Landscapes. (68)</p> <ul style="list-style-type: none"> In 2017 The Abbotsford Estate Conservation Management Plan was commissioned from Peter McGowan Associates which clearly states that ‘The view from the North Terrace, and from the North rooms of the house and from the haugh and riverside, continue to be unspoilt by development.... The view of the Netherbarns’ bank and hillside is an outstandingly important part of the setting of Abbotsford and needs to be protected from intrusive development.’ (68) Whilst it is stated in the Main Issues Report that one of the requirements for development will be ‘Reinforcement ... to the existing planting along the south eastern boundary of the site to further protect the setting of Abbotsford House’ this will not offer sufficient protection, given that the existing planting is deciduous, offering little screening over the winter months. Furthermore, the screening effect is likely to be reduced as the mature trees are lost to old age, or as a result of climate change. Further thinning of the screen will occur in the medium to long term if, as has been proposed, the Borders Railway is extended beyond Tweedbank towards Carlisle. (68) |
| Galashiels | AGALA029 (Netherbarns) | Contributor objects strongly to the proposed allocation (alternative). This is an area in full view of Abbotsford, the Eildon & Leaderfoot National Scenic Area, the Designed Landscape around Abbotsford and the many footpaths enjoyed by walkers to Abbotsford and the surrounding area. The Public Inquiry in 2015 concluded that the cultural and landscape considerations were an asset to the locality and should remain free of impact from development at Netherbarns. Nothing has changed since then and this area should be left for the enjoyment of locals and visitors. It’s the beauty and heritage of the area that attracts visitors. This is an important aspect of the economy of the Borders and should not be destroyed. (47, 54, 66) |
| Galashiels | AGALA029 (Netherbarns) | Contributor strongly objects to any allocation of the site. Any development of this site would be very undesirable because of potential risk of damage to a very important landscape, historic and cultural interests and the contribution of tourism to the borders. Abbotsford House is one of our national treasures, and is a real success story in Galashiels. Any development here does not outweigh the value of our Scottish Heritage. Development would be clearly visible from the house and new associated paths, which are very popular with locals and visitors to the borders. Noise and litter from any educational establishment would be detrimental to this particular area. Health and safety issues from major road congestion caused by any development should be avoided at all costs. This greenfield site is a major part in our jewel in the crown in the Scottish Borders. It is these things that make us different and more attractive from other areas, please do not spoil this when there are other options. (78) |
| Galashiels | AGALA029 | Object to the proposed allocation on the following grounds: |

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| | (Netherbarns) | <ul style="list-style-type: none"> • Abbotsford is an internationally important tourist attraction. • The integrity of the setting of Abbotsford would be compromised by a view of houses. • There would be a risk to tourism if this were to happen. • Abbotsford's fundraising abilities - to conserve Scott's legacy - would be undermined. • If tourism were affected, there would be a knock-on effect on jobs. • Abbotsford's aspirations to be recognised as a World Heritage Site would be weakened. • Alternative sites with less detrimental immediate environment impact should be considered. (84) |
| Galashiels | AGALA029 (Netherbarns) | <p>Objects to the proposal to build houses and possibly a primary school on this site. Looking back over The Southern Reporter and Border Telegraph from as recent as 2015, the contributor thought this had been vetoed after the Scottish Government Inquiry, until 2024 or 2027 at the earliest?</p> <p>To propose to build that amount of houses and a school next to "The Tweed Conservation Area" and overlooking Abbotsford, the number one tourist attraction in the Borders does not seem right. Surely the school, which the contributor assumes is to replace St Peters, should be part of the campus for a new Galashiels Academy. Also, the main road is heavily congested at the moment and couldn't handle the increased car and pedestrian traffic, apart from being too far out of town to safely walk to. Abbotsford is a world famous tourist attraction, which has had £15 million spent on the house, visitor centre and surrounding paths. From Abbotsford you can see right into the Netherbarns field even in the Summer when the trees are in full leaf. Imagine the view only yards away if there are 45 stark white houses and a school to look onto with the resultant constant noise, traffic, smells and litter. (Remember how the view from the Eildons was spoiled by the big white houses at Dingleton, or take a walk round Gala Academy and Policies to see the litter and constant noise and traffic. What is now a popular, tranquil walk along the river via the new Abbotsford paths will become a cacophony of noise and visual pollution. Planting along the site boundary will take years to establish itself and will not alleviate the problem as from Abbotsford and the high paths you are looking down right into the site. Finally, with the establishment of the new railway and the coming of the Tapestry, the aim of making Galashiels, Abbotsford and Melrose the growing tourist heart of the Borders will be destroyed if the jewel in the crown is to be blighted by a view of urban sprawl over what used to be attractive Greenbelt. Thanks for passing on my concerns about the urbanisation of our wonderful Borderlands. (85)</p> |
| Galashiels | AGALA029 (Netherbarns) | <p>SEPA require a Flood Risk Assessment (FRA) which assesses the risk from the River Tweed. Review of the surface water 1 in 200 year flood map and steep topography nearby indicates that there may be flooding issues within this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Site will need careful design to ensure there is no increase in flood risk elsewhere and proposed housing is not affected by surface runoff as properties/ infrastructure upslope have been affected by flooding. The site has a potential surface water hazard and water environment considerations. (119)</p> |
| Galashiels | AGALA029 | The contributor fully supports opposition and the previous public enquiry conclusion (Richard Dent 2015) |

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| | (Netherbarns) | in their opposition to the housing proposal. It is almost unthinkable that such a crass proposal could be made to spoil what is for Scotland and the Borders a gem of such beauty. (135) |
| Galashiels | AGALA029 (Netherbarns) | As a friend of Abbotsford, the contributor feels that nothing should be built that alters the view across from the river, the view Sir Walter Scott would know. There is a lot of space in the Borders. It should be possible to build new housing without encroaching in any way on Abbotsford as it has remained since Scott's time. The contributor opposes any changes to the Abbotsford view. (148) |
| Galashiels | AGALA029 (Netherbarns) | The contributor considers that the proposal to build 45 houses on 7.3 HA at Netherbarns opposite to Abbotsford House is ridiculous. Abbotsford is the most successful tourist attraction in the Borders - a real success story - why is the Council threatening to spoil the tourist experience of this wonderful house and its gardens by building modern houses immediately opposite on the banks of the Tweed? The renovation of Abbotsford has involved the expenditure of millions of pounds. The whole project has involved the dedication of many experts and the commitment and time of large numbers of enthusiastic volunteers. When visitors are being conducted through the house, one of the high points of the tour is the view out of the bow window of the dining room looking across the Tweed because, just before his death, Scott had his bed moved into the dining room so that he could see and hear his beloved Tweed river. This was the last view he looked at. It will be extremely disappointing for visitors to look across the river at a suburban sprawl. What the thousands of visitors to Abbotsford want to see is the view that Scott saw that was such an inspiration to his writing. It is impossible to hide 45 houses simply by 'reinforcing existing planting' along the south-eastern boundary of the site. The River Tweed Special Area of Conservation deals not only with wildlife but must also encompass landscape interests. The Scottish Planning Policy document (23 June 2014) Policy Principal 29 clearly states that there is a duty - 'protecting, enhancing and promoting access to natural heritage including green infrastructure, landscape and the wider environment'. Also avoiding over-development and protecting the amenity of new and existing development. No housing developments must ever be permitted to destroy this national and international treasure that is Abbotsford House. A permanent moratorium on any future building on this site should be placed on this site. (153) |
| Galashiels | AGALA029 (Netherbarns) | It is the contributor's opinion that developing on the land at Netherbarns would damage the historical integrity of one of the region's (and indeed the nation's) most important heritage assets, and one that will become hugely important for the Scottish Borders economy in the years of major Walter Scott anniversaries coming up in the near future. Abbotsford was created by one of the world's literary superstars in order to enjoy the views of his beloved River Tweed - this is its entire reason for existence. Having seen some of the amazing family archives held at the house, I know that the family have been fighting tirelessly to try and preserve this crucial view from destruction and compromise for well over one hundred years. They did this because the estate was always intended to be free to access and enjoy for the local community as a green and pleasant space to escape to. Now that Scott's estate is in the hands of a local charity growing in momentum and ambition as the years go by, the prospect of developing on |

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| | | the adjacent land seems sure to curtail their future success and opportunities across the board. With many tourists, particularly those who are coming from overseas, using Abbotsford as their gateway to the Borders, to jeopardise the appeal of this site seems ludicrous. It undermines past investment in the place, it puts local jobs at risk, and it risks damaging a community engagement programme that is doing wonderful and transformational things for the disadvantaged people of the local area. The contributor hopes that an alternative site can be found so that we can preserve what is best about the Borders (its historic estates, vistas and unique character), whilst addressing the very real housing shortage. (163) |
| Galashiels | AGALA029 (Netherbarns) | Historic Environment Scotland (HES) advise that development of this site has potential for negative effects on the setting of A listed Abbotsford House (LB15104) and the Abbotsford House designed landscape (GDL00001). Whilst HES consider it possible to mitigate effects to an acceptable level for our statutory interests, HES welcome that this is an alternative, rather than preferred, option. In the event that this option is brought forward to the Proposed Plan, HES accept the principle of development for up to 45 units, subject to the robust application of the site requirements and development of a site masterplan. HES would expect the masterplanning process to consider how various factors including building scale, location within the landscape, layout, materials, character, number and type of housing units can mitigate potential effects, and to provide a framework for detailed proposals which comply with local and national historic environment policy. HES's views on a masterplan, and any application for this site, will be dependent on the level to which potential effects have been mitigated. HES would expect HES to have early involvement and consultation in the masterplanning process. (164) |
| Galashiels | AGALA029 (Netherbarns) | The contributor objects to this site being included as an 'alternative site'. This site has been rejected four times in the last 12 years at public Inquiries and local plan examinations. Considering the effect on Abbotsford the Reporter at the last inquiry stated 'It appears to me that cultural and landscape considerations combine to provide an asset which should remain free of the impact of the suggested allocation and any subsequent development of Netherbarns. The contributor does not accept that the woodland screening would adequately mitigate the adverse impacts of the allocation on the setting of the house or the designed landscape.' This site is also outwith what people consider to be walking distance of schools, shops or either railway station. Building on this site would be contrary to the aims expressed at para 3.6 and 3.7 of the MIR. (187) |
| Galashiels | AGALA029 (Netherbarns) | The Southern Uplands Partnership are aware that the Netherbarns site faced strong opposition when it was suggested last time, and are surprised that it is being put forward again. It would be interesting to know what has changed in the meantime. It could be argued that Abbotsford is now attracting significantly more visitors and playing an even more important role in the local economy - so there is even more reason not to threaten it with this development site. (196) |
| Galashiels | AGALA029 (Netherbarns) | The inclusion of this site given the repeated proposals and appeals and dismissal and arguments and debates that have resulted in it being deleted from previous plans seems to be a perverse and indeed provocative proposal. It should be deleted. (206) |

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| Galashiels | AGALA029 (Netherbarns) | SNH's previous advice on this site was that it "lies outwith the current settlement boundary as shown in the LDP. SNH understand that the site was included as an allocation in the Proposed Plan but, in their report of examination, the Reporter recommended its deletion. This recommendation was based partly on landscape impacts. SNH are not aware of a potential solution that should change that decision." SNH do not consider that this situation has changed and consider that this site should not be allocated due to the previously identified landscape impacts. (213) |
| Galashiels | AGALA029 (Netherbarns) | The contributor disagrees with the option to develop this site for housing because of the visual impact that it will have when viewed from Abbotsford House. The land is very sloped and the suggestion that it can be screened by trees is unrealistic. Abbotsford House itself is elevated above the river and the proposed development on Netherbarns will be detrimental to the image that visitors will take from visiting Abbotsford. The Abbotsford Trust has invested hugely in the House and grounds and the status of Abbotsford as a major tourist attraction could be affected. The contributor would prefer to see more brownfield sites being developed rather than greenfield sites. (228) |
| Galashiels | AGALA029 (Netherbarns) | The Selkirk and District Community Council regrets the spread of urbanisation into this open environment which overlooks the River Tweed/Abbotsford House and policies. (305) |
| Galashiels | AGALA029 (Netherbarns) | The contributor is opposed to this proposal for 45 units here. The site has been rejected at public inquiries several times already, for reasons that are well-documented and these have not changed. Naturally the owner/builder/developer wants a return on their investment, and it is a strange irony that the name Ballantyne should still be causing grief to the heritage that Sir Walter Scott has left to us, and which enriches our lives and which through tourism and visitors to Abbotsford, brings a much needed boost to the economy of the whole region. It would be a most regrettable mistake to risk in any way, the integrity of the setting of Scott's wonderful estate and legacy. How would a modern housing estate look plonked in front of any of the other big historic Borders houses, visible from the road? Planning permission for that would not be acceptable - neither should it be for Abbotsford. Galashiels has many spaces closer to the centre of town that could provide land for development - in particular for affordable housing units which are in such high demand (vis the number of applications for the proposed new development in Newtown St Boswells, as revealed by Eildon Housing Association, which outnumbered several times over the number of units planned). Incentives from the Council to owners of these brownfield town centre sites could result in enabling housing development within walking distances of services and facilities without compromising sensitive landscapes. The Council should be in no rush to allow development of this ultra-sensitive site at Netherbarns, for the economic gain of a developer, when to do so puts key assets in jeopardy and does not meet the needs of sectors of the housing market that are currently not well catered for. |

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| | | <p>Sufficient overdevelopment so close to the River Tweed and far from the town centre has already been permitted - wrongly, in my opinion. Furthermore, this site, located adjacent to busy junctions and carriageways is not likely to promote cycling and walking into town which is a requirement for new sites. On the contrary, development at this location is only going to increase the number of car journeys made by residents and service vehicles, and add to traffic congestion and pressures on parking availability in town.</p> <p>Most of the building (apart from the estates around the Kingsknowes Hotel) on this side of the Tweed consists of large individual houses surrounded by lots of land. It would be marginally more acceptable to allow for a similar scale of development on this site, rather than a suburban style of development which, when looking towards the direction of Selkirk, is not in character with its surroundings.</p> <p>If push comes to shove over this site, a limited number of plots could be sold off with strict conditions attached to encourage the creation of small holdings - stables, orchards, woodlands and other features - which would preserve and if done correctly, enhance the rural character of the setting.</p> <p>Siting and setting of developments are valid planning matters and must be respected. (143)</p> |
| Galashiels | AGALA038 (Easter Langlee Mains II) | <p>The contributor objects to the exclusion of this site from the MIR. The contributor believes that the site could provide a valuable contribution to the housing needs of Galashiels for the next 15 years.</p> <p>The contributor considers that the site has a few issues to overcome prior to development but none of these are insurmountable. The principle obstacles are;</p> <ul style="list-style-type: none"> • The presence of significant electricity and gas transmission plant; • The traffic capacity of the existing Langshaw Road (C77); • Potential noise from waste transfer/aggregate crushing and sorting plant; and • Potential smell and gas ingress from former landfill. <p>The site has some very distinct advantages; namely;</p> <ul style="list-style-type: none"> • It is available now; • It is a well contained site due to topography and vegetation; • It is low value agricultural land; • It has no outstanding landscape or recreational value; • It is close to the settlement boundary with existing access and achievable new access links; and • It is a large site capable of contributing significantly to fulfilling the authorities' housing requirements. <p>All of the concerns expressed in the Main Issues Report for AGALA038 can be overcome, or in some</p> |

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| | | <p>cases are not issues that should lead to a conclusion of rejection.</p> <p>The site can play a very important role, in the very least for longer term housing provision, and it would be unfortunate not to recognise the potential that this site has. The site is being put forward by the land owner and the land is available as soon as the reconfiguration of power lines can be agreed.</p> <p>At present very little new housing provision has been catered for in the Galashiels area by LDP2. It is only a matter of time before the area's potential is fully realised, following the success of the Borders Railway, now entering its fourth year. Galashiels lies at the heart of the Borders, and was historically the centre of the 'Tweed' industry. It is a university town, home to Heriot Watt University's School of Textiles and Design. It has a vital transport interchange on the Borders Railway. The current LDP2 has only allocated 45 units to the town. While it is appreciated that there are large allocations from previous LDP and SG, there needs to be greater supply of land for housing that is ready to be developed within a five year period, and certainly with a view to the next 10 years.</p> <p>Housing in the Galashiels area is far more likely to lead to greater inward investment to the region and towards the betterment of the central Scottish Borders. Increasing housing in Peebles, for example, is more likely to create commuter housing for people working in Edinburgh due to its greater proximity to the capital. The benefits to the region will therefore be significantly diluted. Far greater benefit will be realised by strengthening Central Borders towns, and more importantly, it is towns like Galashiels and Hawick that require to be driven harder in order to improve their vitality and economic self-sufficiency, which in turn will draw investment down the A7 corridor.</p> <p>Also, and very important to the consideration of the site, the applicant is very keen to maximise the level of low cost and social housing within the site, well above the 25% policy requirement.</p> <p>Finally, a degree of mixed development could be considered if this were to help further mitigate any issues related to the neighbouring uses to the east of the C77. (24)</p> |
| Galashiels | AGALA040 (Land to North of Wood Street) | <p>Network Rail (NR) submit this new site for consideration. The site is owned by NR and is partly located within the settlement boundary of Galashiels adjacent to the railway. NR note that the site is currently wooded and there is an existing path on the site. NR are of the view that the site could form a comprehensive form of development with frontage units, an access road and strategic boundary landscaping subject to development boundaries being reconsidered as proposed. (294)</p> |
| Galashiels | BGALA006 (Land at Winston Road) | <p>The contributor believes that this site should be allocated for housing within the LDP2 for the following reasons:</p> <ul style="list-style-type: none"> • It is deliverable within the Local Plan lifespan. The developer owns the land and has the finances and |

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| | l) | <p>resources to bring forward the development within the plan period. The demolition process has already taken place and an application will be submitted in the near future. There has also been interest shown by a housing association.</p> <ul style="list-style-type: none"> • 71 units can be delivered outside the overhead power line zone. However the aim is to decommission these pylons and relay underground in order to get a maximum developable area. • It is in a sustainable location: highly accessible to Galashiels town centre, bus services and Tweedbank Train Station. • It is a brownfield site and relates well to the existing built up area, with existing residential properties to the west and next to MGALA003, a mixed use development opportunity. • It has very easy access to utilities/ infrastructure. • The site is not at risk of flooding from the River Tweed. • Affordable housing will be provided on part if not all of the site in accordance with Policy HD1. • There are no issues with access to the site. • The site is considered acceptable in principle for residential development. <p>The contributor stresses that it is highly important to allocate housing in the Scottish Borders where there is a strong demand to live and especially on vacant brownfield land within settlement boundaries. (131)</p> |
| Galashiels | General | 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? (80, 233, 271, 227) |
| Galashiels / Hawick / Walkerburn | General | Borders towns such as Galashiels, Hawick (233) and Walkerburn would benefit from increased housing to bring greater life and vitality to them and to help stem the loss of residents and to reinvigorate these areas. (149, 229) |
| Galashiels / Melrose / Stow | General | The contributor suggests that housing would be best located in Galashiels, Melrose and Stow due to the railway. (300) |
| Galashiels / Tweedbank | General | Millions of pounds have been invested in the Tweedbank railway line, surely its common sense to build more houses there and it would help their local economy. It gets more like a ghost town every time we visit, let's face it Galashiels is not a tourist hotspot and the contributor doesn't mean that in a detrimental way. (51) |
| Galashiels / Tweedbank | General | The reopening of the railway line to Galashiels and Tweedbank suggests that it would be logical to try and develop areas around the rail link, which would encourage people to use more sustainable transport. (139) |
| Galashiels / Tweedbank / Melrose | General | A site should be identified adjacent to the railway (within the Galashiels/Tweedbank/Melrose area) where a retirement village for the ageing population could be established. Being close to the railway would make the development particularly attractive as it would enable ready access to Edinburgh for an age group where car ownership may be less. The development would also benefit from being close to the |

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| | | Borders General Hospital. The contributor suggests various broad sites within the Galashiels/Tweedbank/Melrose area. (90) |
| Gattonside | AGATT013 (Gattonside Meadow/ Castlefield) | <p>The contributor seeks to include housing land at Gattonside Mains as an alternative option. The contributor contends that the proposal will meet the aims and objectives of the development plan by:</p> <ul style="list-style-type: none"> • Ensuring sufficient new housing land is available allowing for a phased approach to the release of housing land; • Meeting the economic prosperity and environmental quality strategic objectives; • Locating development which minimises the number and length of car journeys by providing new homes adjacent to a transport corridor; • The contribution to the strategy and policies of the Development Plan and other national and local policy objectives; • Delivering a proposal within a 5 year timeframe, or within such timeframe that it helps reduce the pressure on the planning authority to deliver it's already allocated sites; • The provision of choice across the housing market area; • The design, quality and density of development that can be achieved; • The proposal will not have a significant adverse effect on any natural or built heritage interests or any national or international environmental designations; • The proposal can support the existing services in the village; • The proposals can contribute to the facilitation of improved facilities in the village and in neighbouring villages; and • There are no other significant environmental dis-benefits or risks, for example flooding. <p>There is a clear requirement for the Local Development Plan to identify further housing land supply in the Central Borders Housing Market Area, and within the area identified as rest of central housing market area. Allocation of the subject site will help to meet the 5 year housing land supply shortfall. Accordingly, it is requested that the site should be included in the list of allocated sites within the LDP. (176)</p> |
| Gattonside | SBGAT002 (Development Boundary Amendment) | <p>Contributor objects that the site is not currently within the development boundary of Gattonside. The existing development boundary follows the west side of the existing Fauhope driveway running roughly north to south, before returning west and then north around the north west most section of Fauhope House's garden boundary.</p> <p>The land adjacent to the site is under a Tree Preservation Order. The proposed site has a few small fruit trees remaining centrally and has some larger hardwoods around the boundary edge. The contributor is of the view that the centre of the site would lend itself to the development of a single dwelling without impacting on any of the mature trees or the surrounding environment.</p> <p>The proposed site, whilst separate and classed as countryside around town, would probably be of unique</p> |

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| | | <p>new-build design but would still assimilate with the Monkswood development to its south and west because of the layout relationship and its position to the west of the existing Fauhope House driveway. Whilst the proposed site would be accessed from the driveway serving Fauhope House, the connectivity and grouping of the proposed site with the existing Monkswood site would not be lost because of this. It is the driveway that forms the separation of any future or existing development or building group. Land previously within the garden bounds of Fauhope (west of the driveway) has now been developed and is part of the Monkswood site and whilst it is accessed from the Monkswood site, the contributor sees no reason why the proposed site could not be adopted on the same principle given the relationship of the site. This potentially would require the existing development boundary to be moved to the east side of the Fauhope driveway so that access is taken from within the development boundary. Moving the development boundary to the east side of the driveway does not risk further development other than that proposed above.</p> <p>Gattonside has adequate zoned land at St Aidans but it is not clear whether this will be developed in the short term. Zoned land which isn't developed in the short to medium term does not achieve the Scottish Government or Scottish Borders Council targets for new housing. The proposed site above is deliverable, small scale and has minimum impact on its surrounds and should be supported. (316)</p> |
| Gavinton | AGAVI002, Land at Langton Glebe | The contributor has submitted a site (AGAVI002) for consideration as a potential housing allocation. The contributor states that the site is currently in agricultural use and has three existing access points. They state that it is anticipated that any built development would be restricted to the northern section of the site, with the southern section retained as open space. The contributor includes a Supporting Statement alongside the proposed allocation. (325) |
| Gordon | AGORD004, Land at Eden Road | <p>The contributor raises the following concerns regarding the preferred option for housing in Gordon;</p> <ul style="list-style-type: none"> • Existing problem with sewerage in the surrounding area, given that the current system is already at capacity. Overflowing waste flows into neighbouring gardens on an annual basis; • Very damp field and substantial drainage would be required; • Would be imperative that all hedging and trees are retained, and their number enhanced to maintain the rural edge of the village; • It is considered that the density of housing is too great. This is a village where most houses have a substantial garden. To ensure Gordon remains an attractive village in which to live, it is important to ensure all new builds will have similar large gardens; and • Considers the site more appropriate for 12 houses. (138) |
| Gordon | AGORD004, Land at Eden Road | SEPA state, in respect of co-location, that the site is next to Gordon STW. May be likely to give rise to odour issues, however any issues would be dealt with by SBC Environmental Health. Foul water must connect to existing SW foul network. (119) |

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| Grantshouse | AGRAN004, Land North of Mansefield | SEPA advise that based on the OS Map, there is sufficient height difference between the site and the Eye Water. Due to the steep topography through the allocation site, consideration should be given to surface runoff issues to ensure adequate mitigation is implemented. Site will need careful design to ensure there is no increase in flood risk elsewhere and proposed housing is not affected by surface runoff. Foul water must be connected to the existing Scottish Water foul network. (119) |
| Greenlaw | AGREE008, Halliburton Road | SEPA advise that based on OS Map there is sufficient height difference between the site and the Blackadder Water. Due to steep topography through the allocation site, consideration should be given to surface runoff issues to ensure adequate mitigation is implemented. Site will need careful design to ensure there is no increase in flood risk elsewhere and proposed housing is not affected by surface runoff. Foul water must connect to the existing Scottish Water foul network. (119) |
| Greenlaw | AGREE009, Poultry Farm | SNH note the proximity of the River Tweed SAC and advise that this site should be included in the HRA of the plan. They advise that a site development brief should set out the site requirements for this prominent gateway site. Establishing an appropriately designed landscape edge, a co-ordinated approach to development frontages and exploring the potential for path connections to promote cycling and walking on off-site access routes (such as the use of the disused railway) should be explored and details clearly set out in the site requirements. (213) |
| Greenlaw | AGREE009, Poultry Farm | SEPA state, in respect of co-location, that the site is next door to the Greenlaw STW (CAR licence). Unlikely to be any issue from SEPA's perspective but any odour complaints would be dealt with by SBC Environmental health. Should the layout or land-use differ from what was previously agreed we would require an FRA which assesses the risk from the Blackadder Water and small watercourse along the eastern boundary. Due to the steepness of the adjacent hill slopes we would also recommend that consideration is given to surface water runoff to ensure the site is not at risk of flooding and nearby development and infrastructure are not at increased risk of flooding. There is a surface water hazard identified. Foul drainage from the development must be connected to the existing SW foul sewer network. Depending on the use of the proposed site (eg industrial units) there may be a requirement for permissions to be sought for certain activities from SEPA. (119) |
| Greenlaw | AGREE009, Poultry Farm | The contributor supports the allocation of the preferred housing site (AGREE009) in Greenlaw. They state that planning consent was granted in October 2018, demonstrating that the site is not obstructed by any specific technical matters relating to ecology, hydrology, archaeology or planning policy. The conditions attached to the planning consent, demonstrate that these matters can be mitigated or accommodated. With completions at their lowest since 2015, there is a serious and pressing need to allocate effective sites. The limited take-up of housing sites demonstrates that there has been a failure to allocate effective sites. |

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| | | <p>While the housing requirements of SESPlan are low relative to the land available, low build rates mean that ineffective sites are being allocated. This makes inclusion of preferred, effective sites like (AGREE009) vital.</p> <p>Inclusion of site (AGREE009) within LDP2 as an allocated sites for housing, would necessitate an extension to the Greenlaw Development Boundary, placing the site within the development envelope.</p> <p>Given the location and former use of (AGREE009), housing is not in conflict with the existing styles and character of the community which bound the site to the west. The existing disposition of residential buildings north and west of the proposed development, that comprises various styles and scales, leads us to suggest that the development would in fact complement the existing housing as the next logical progression in the expansion of this community. (219)</p> |
| Greenlaw | AGREE009, Poultry Farm & AGREE008, Halliburton Road | The contributor agrees with the preferred and alternative options for housing in Greenlaw. (215) |
| Hawick | AHAWI027 (Burnfoot – Phase 1) | The Southern Uplands Partnership note that at least one site identified for development (Hawick) includes "wetland". This would suggest that such areas are likely to be of at least some ecological value and therefore worthy of careful survey before decisions are made. Such wet ground is unlikely to be ideal for development. (196) |
| Hawick | AHAWI027 (Burnfoot – Phase 1) | <p>SNH welcome the intention to prepare a site development brief for this proposed allocation. As recommended for BHAWI004, SNH consider that a co-ordination between sites will be needed in order to maximise benefits for placemaking and landscape mitigation/ green infrastructure connections. Close attention should be paid to the settlement edge and to maintaining key views and the character of the approach to Hawick on the A7. Site requirements should include:</p> <ul style="list-style-type: none"> • Green infrastructure connections through the site, including links to housing at Burnfoot and the existing path network to the east of Burnhead Road. • Establish SUDS as part of green network in south-western corner of the site. • Close attention should be paid to the existing settlement edge and to maintaining key views from the A7 and the B6359. (213) |
| Hawick | AHAWI027 (Burnfoot – Phase 1) | Selkirk and District Community Council is of the view that this is a very open, highly visible/overlooked area and the local environment needs to be protected and enhanced in this particular 'gateway' location. However, this comment applies to all such proposals which introduce development at prominent sites or at the approaches to existing settlements. (305) |
| Hawick | AHAWI027 | SEPA note that there appears to be a marsh/wetland at the southern end of the site which should be |

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| | (Burnfoot Phase 1) | protected/enhanced. Historic maps show a watercourse flowing through the middle of the site which may now be culverted. SEPA require a Flood Risk Assessment which assesses the risk from this culverted watercourse. Buildings must not be constructed over an existing drain (including a field drain) that is to remain active. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Due to the steepness of the adjacent hill slopes, SEPA would also recommend that consideration is given to surface water runoff to ensure the site is not at risk of flooding and nearby development and infrastructure are not at increased risk of flooding. The site has a potential surface water hazard and water environment considerations. (119) |
| Hawick | AHAWI027 (Burnfoot Phase 1) | The contributor does not agree with this preferred option for the following reasons: <ul style="list-style-type: none"> • It is beside a council estate, and would end up being an extension of this already unattractive estate, and exaggerate the problems that go with this type of estate. • It is part of an existing wetland. Removal of this wetland would be contrary to the current sustainability of protecting the natural environment. • The land has been in the same family since 1400s, and the area has already been depleted in size over the years due to encroachment from the town. • Removal of this land would potentially destroy this historic family home. • This is Prime arable ground which should be preserved for food production and biodiversity. (212) |
| Heriot Station | AHERI003 Heriot East | The contributor seeks the allocation of site AHERI003 Heriot East within LDP2 for housing. The land at the former Heriot Station has been identified in the Network Rail estate as surplus to requirements. The station closed in 1969, and whilst the former station building has been retained as a private dwelling, the platforms and other associated buildings that formerly stood on the site have been demolished. The hardstanding and access points associated with the former use remains and the visual appearance of the site could be improved by identifying a suitable future use. The site is considered most suited for residential development and is put forward for assessment through the LDP process on this basis. It comprises previously developed brownfield land and its re-development would tidy up the site and provide additional units to be read alongside the existing housing within the settlement at Heriot Station to the west of the site. The existing subway would provide linkages with the settlement. The contributor is not aware of any environmental impediments to the development of the site. (294 (2 & 3 of 3)) |
| Heriot Station | Heriot | The contributor states that small-scale organic developments in the future that will ensure that Heriot remains a vibrant community with housing for young families to the school remains viable. In addition, Heriot community will actively encourage the building of social housing suitable for renting to young families. (105) |
| Jedburgh | AJEDB018, Land east of Howdenburn | The contributor has reviewed the surface water 1 in 200 year flood map which shows that there may be flooding issues in this area. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Any foul must connect to SW foul sewer network. The contributor |

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| | Court II | <p>also advises that the site has a potential surface water hazard and water environment considerations. (119)</p> <p>The contributor states the site appears to be infill between existing housing at Howdenburn Court and existing allocation RJ2B. The adopted Planning Brief for Lochend identifies pedestrian links between RJ2B and Howdenburn Court. These links should be designed into any allocation at AJEDB018. Design and landscape principles set out in the Planning Brief should be applied to this site. (213)</p> |
| Jedburgh | MJEDB003, Land at Edinburgh Road | <p>The contributor seeks to amend the allocation of the site within the LDP from business and industrial to one which supports roadside food and drink uses, with a view to creating a new positive gateway feature into the town that will complement the existing facilities.</p> <p>The contributor states that previous planning applications and development plan representations have been submitted for the site to secure its use (alongside the adjacent site) for class 1 convenience retail use. None of these approaches have been successful despite significant local support. The site has been marketed for its existing industrial use for circa 5 years with no significant end users coming forward, and only temporary lettings being secured, with these lettings being for uses that are of low value, both to the site owner and also to the local economy. This latest approach to the site seeks to present a use that will benefit the local town by providing a roadside provision, suitable to serve the needs of those traveling to and from Jedburgh to Edinburgh and beyond. The contributor has provided a plan of the site indicating a potential layout. This shows the option for a drive through restaurant accompanied by some smaller units that could accommodate other class 3 related uses such as cafés or fast food facilities. (321)</p> |
| Jedburgh/ Kelso | General | The contributor states we should be encouraging more development in Jedburgh and Kelso to support the schools and small business' (168) |
| Lamancha | ALAMA001 Grange Courtyard | The contributor seeks the allocation of site ALAMA001 for housing. (75) |
| Lauder | ALAUD008 Maitland Park Phase 2 | The contributor seeks the allocation of this site for housing with an approximate capacity of 60 units. The contributor has submitted a Development and Landscape Capacity Appraisal with a preliminary Concept Masterplan contained within it. The submission also includes a flooding statement. The contributor discusses elements of the Council's site assessment carried out for the site and in particular disagrees with the element of flood risk in that they consider there to be " <i>only a narrow band of flood inundation entering the southern margins of the site from the Lauder Burn</i> ", where as the site assessment states that there is "There is flood risk on substantial part of site along southerly edge". The contributor also states that the site is well defined, visually contained and benefits from a strong relationship to the existing settlement, and that the detailed landscape appraisal undertaken demonstrates that development within the "Level Land" Local Landscape Character Area is not constrained for reasons relating to landscape setting and there is no impediment to development progressing. |

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| | | It is considered that the site is effective and can be delivered, and can contribute to meeting the LDP2's housing requirement. (123) |
| Melrose | AMELR008 (Land at Dingleton Mains) | <p>The contributor proposes that this site is effective and can be delivered within the short term for the following reasons:</p> <ul style="list-style-type: none"> • Melrose is located within the Central Borders Strategic Development Area (SDA) which is one of the four SDAs that SESplan states that development will be focused on within the Midlothian / Borders Sub Regional Area, and which is further articulated within the emerging SDP. Policy 5 Housing Land articulates that the Development Plan shall maintain a sufficient supply of housing land throughout the Plan period. • The site is 3.2 hectares and is located adjacent to the site allocation of EM4B within the Scottish Borders Local Development Plan 2016. The Dingleton Mains site forms an appropriate extension of this site (known as The Croft which was formerly allocated for 50 units) and offers the opportunity to meet the Council's original aspiration for 50 new homes in the area. The site can be considered to be a logical extension to the settlement boundary of Melrose. • The site is well contained by roads and existing landscape. The topography of the site allows for development that would not significantly impact upon the surrounding landscape and would not be readily visible from Dingleton Road. The site is not dissimilar to The Croft site. • The site is in close proximity to Melrose and offers convenient and sustainable access to local services. The site represents an opportunity for modest expansion of Melrose within clearly defensible boundaries. <p>It is therefore submitted that the site should be allocated for residential development within the forthcoming Scottish Borders LDP2. (177)</p> |
| Melrose | AMELR012 (Bleachfield) | <p>The contributor contends that the site should be allocated for 40 houses and a care home within the LDP2 for the following reasons:</p> <ul style="list-style-type: none"> • It is deliverable in full within the Local Development Plan lifespan. • It is not within an area of Flood Risk. • It is in a sustainable location highly accessible to Melrose town centre, bus services and Tweedbank Train Station. • It is next to current built form and thus easy access to utilities/infrastructure and a natural low lying extension. • It will in no way lead to urban coalescence with Darnick. A clear defensible boundary will be provided around the site and beyond this adequate greenfield spacing will remain. • It will not have a significant visual impact due to its low lying nature and neighbouring built form sitting at a higher level. • There is no allocation within this area of Melrose despite it being in high demand for new homes. |

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| | | The contributor stresses the importance of allocating housing in the Scottish Borders where there is a strong demand to live and notes there is a clear demand for homes in Melrose. (130) |
| Melrose | AMELR013 (Harmony Hall Gardens) | The contributor considers this would represent the loss of a valued community resource and attractive open space within the town. The contributor considers it is difficult to believe that developers could deliver housing without significant loss of trees and damage to the southern stone wall, even if (only) building five houses. Buildings higher than single storey would indeed need to be excluded or would be intrusive on the setting of Harmony Hall as seen from the road that runs in front of Melrose Abbey. The proposed house numbers would only make a small contribution in the town of Melrose, where there are unbuilt allocations on the Dingleton site (EM32B) and other potential brownfield sites in Melrose, currently owned by a local developer at West Grove and Priorwood House. (60) |
| Melrose | AMELR013 (Harmony Hall Gardens) | Melrose and District Community Council are less supportive (in comparison to their support for ADARN005) for this site, the main concerns being loss of greenspace and road safety on St. Mary's Road. (82) |
| Melrose | AMELR013 (Harmony Hall Gardens) | SEPA note that a Flood Risk Assessment is required and that there are water environment considerations. (119) |
| Melrose | AMELR013 (Harmony Hall Gardens) | Historic Environment Scotland (HES) advise that the development of this site, which is partially within partially within SM90124 Melrose Abbey, has the potential for significant negative effects on the historic environment. In view of this, HES welcome that this is an alternative, rather than a preferred, option. However, HES consider that the proposed site requirements should be sufficient to mitigate the potential negative effects on the scheduled monument, and its setting, to an acceptable level for their statutory interests. In the event that this option is carried forward to the Proposed Plan, HES would expect early engagement on any detailed proposals for this site. (164) |
| Melrose | AMELR013 (Harmony Hall Gardens) | The recognition of this site as a suitable location for a small scale housing development is fully supported by the National Trust for Scotland (NTS). NTS consider that this is an effective site that can be delivered during the plan period and it is requested that this site is specifically allocated for housing in the LDP2. NTS note that both existing allocated sites within Melrose have progressed to the planning application stage and have been or are in the process of development. The allocation of this site would provide an opportunity for a small scale residential development within Melrose to meet market demand and would provide flexibility and choice to the Melrose housing market. Planning Advice Note (PAN) 2/2010: Affordable Housing and Housing Land Supply outlines the criteria for assessing the effectiveness of a site. Paragraph 55 of this PAN sets out the criteria relating to ownership, physical, contamination, deficit funding, marketability, infrastructure and land use. The contributor notes the following: |

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| | <p>Ownership – The site is in the ownership of NTS and can be released for development.</p> <p>Physical – There are no known physical constraints that would prevent development at this location. Ground stability is not considered to be an issue due to low and very-low risk of historical mineral and coal extraction respectively. Flood risk is identified as a low-to-medium concern and a Flood Risk Assessment has been recommended to accompany any planning application. There is an existing site access from St Mary’s Road.</p> <p>Contamination – The site is currently greenfield land. The Phase 1 geo-environmental desktop study prepared by Stuart Burke Associates concludes that the likelihood of contamination is low (this study has also been submitted).</p> <p>Deficit Funding – It is not considered that public funding would be required to make this site economically viable.</p> <p>Marketability – The site is capable of being delivered during the plan period. The residential sites allocated in the adopted Local Development Plan have been brought forward for development. Melrose is a highly desirable location and it is anticipated that there will be demand for a low density residential development at this location.</p> <p>Infrastructure – The required infrastructure to service this site can be provided to allow the site to be developed. Access to the site can be created from St Mary’s Road via the existing site access.</p> <p>Land Use – the site is located in a residential area and located within close proximity to local services and amenities such as St Mary’s School, the bowling club and Harmony House. Residential is considered to be the most appropriate land use for this site.</p> <p>As demonstrated above, NTS consider this to be an effective small scale housing site that can be delivered in the plan period and contribute towards the housing land supply for the Housing Market Area.</p> <p>The alternative option allocation in the MIR identifies an indicative capacity of 5 units. This scale of development is supported by NTS. An Indicative Layout Plan has been submitted in support of this representation. This demonstrates that the site is capable of being delivered for a low density development of 5 units. This scale of development would allow the mature trees on site to be retained, where possible. As shown on the Indicative Plan, access could be provided from the existing access point in the western section of the traditional wall facing onto St Mary’s Road, causing minimal disruption</p> |
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| | <p>to the wall itself.</p> <p>The MIR identifies a number of site specific requirements and NTS is generally supportive of the requirements. NTS is supportive of the retention and protection of the existing boundary features and trees, where possible (bullet point 2 in the Site Requirements). NTS is also fully supportive of ensuring that the design and layout of the site should take account of the Conservation Area, setting of Scheduled Monuments and trees on/adjacent to the site (bullet point 7). NTS agrees with the site requirement which states that access to the site should result in the least disruption to the existing stone wall (bullet point 8).</p> <p>NTS fully recognises that the development must respect the setting of Melrose Abbey Scheduled Monument. Bullet point 6 of the site requirements details that no development within the Melrose Abbey Scheduled Monument would be permitted. The Scheduled Monument boundary extends to the eastern part of this site. NTS agrees with the restriction that no residential units should be built within this part of the site. However it is requested that the wording of this requirement is changed to specifically restrict the development of housing in this part of the site. It is assumed that this part of the site could be utilised for the provision of open space/amenity ground, landscaping and infrastructure.</p> <p>Bullet point 9 states that <i>'existing trees/hedging within and on the boundaries of the site must be retained and protected'</i>. It is requested that this requirement is slightly amended to state that existing trees and hedging must be retained, <i>where possible</i>.</p> <p>Bullet point 10 states that <i>'in order to safeguard the character of the Conservation Area and adjacent listed buildings, dwellinghouses should be restricted to single storey'</i>. The site is situated opposite Harmony Hall House, which is 3-storeys in height. The adjacent St Mary's School also has high pitched roofs and is two storey in parts. It is considered that the design and height of the proposed residential units can be controlled through the planning application process and it is requested that this site requirement is removed.</p> <p>Stuart Burke Associates have prepared a preliminary geo-technical appraisal to identify potential environmental constraints on the site. This was a non-intrusive desktop report that also assessed the potential for contamination, flooding, and ecological impact.</p> <p>The preliminary geo-technical appraisal identified that the site is within an area of low-risk of flooding from the River Tweed. A portion of the northern part of the site is situated within a medium-risk area. Therefore, NTS agrees with the inclusion of the site requirement for a Flood Risk Assessment</p> <p>The appraisal has also indicated that development of the site is at low risk of having an environmental</p> |
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| | | <p>impact on nearby ecological receptors and designations, including the River Tweed Special Area of Conservation, due to the low permeability of soils and distance from the site. However, it is acknowledged that the site exists within environmental designations and that consultation with relevant authorities (SBC, SEPA, and SNH) will be required at application stage. It is requested that bullet point 4 (“Mitigation required to ensure no significant adverse effects upon integrity of River Tweed Special Area of Conservation”) is removed as this will be addressed in bullet point 3 requiring the assessment of ecological impacts and provision of mitigation.</p> <p>NTS fully supports the identification of the land at Harmony Hall Gardens as an alternative residential site. It has been demonstrated above and in the enclosed documentation that this is an effective site that can be delivered during the plan period. It is therefore requested that this site is allocated for residential development in the LDP2. (238)</p> |
| Melrose | AMELR013 (Harmony Hall Gardens) | <p>This open space, once an orchard, and still containing fruit trees, is not an appropriate location for housing development. It is too close to historic buildings, to St Mary’s School exit, to the Melrose Sevens rugby pitch and other recreational sports fields. It is also used during the Book Festival which is a major boost to the local economy. Five single storey houses here (they could not be higher without compromising the surrounding historic buildings) are too many for a site this size and this number or fewer would not be worth the loss of what is currently a valued community resource and an attractive open space within the town. An alternative option would be to utilise unbuilt allocations on the former Dingleton hospital site or potential ‘brownfield’ sites in Melrose, namely West Grove and Priorwood House, currently owned by a local developer, and which are already situated in residential areas. (143)</p> |
| Melrose | AMELR013 (Harmony Hall Gardens) | <p>SEPA advise that it appears that the mill lade may be culverted through this development site. Opportunities should be taken to de-culvert this as part of any development. SEPA require an FRA which assesses the risk from the River Tweed. There was previously a mill lade which flowed along the northern boundary which will also require consideration. (119)</p> |
| Melrose | AMELR013 (Harmony Hall Gardens) | <p>SNH highlight that the site lies within the Eildon & Leaderfoot Hills NSA. While well contained, the site makes an important contribution to the character of St Mary’s Road. The boundary wall, mature trees and orchard combine to give a strong sense of place. SNH have concerns regarding the allocation of the site. SNH’s advice is that the western, slightly elevated, area of orchard should be retained and enhanced through the creation of an enhanced orchard around the remaining trees. Other existing assets such as the boundary wall on the south edge and the mature beech trees on the north edge should also be retained for their contribution to the local environment and the sense of place. Promoting a higher density of development within the remainder of the site could create a development that is in keeping with the wider area, establishing a place that could be adaptable for all stages of life and which is well connected to the town centre. SNH consider all such details should be communicated by a site development brief. (213)</p> |

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| Melrose | AMELR013 (Harmony Hall Gardens) & AMELR014 (Land to West of Ormiston Terrace) | Contributor objects that the land now submitted for consideration at AMELR014 is not being considered for allocation and contests that it would constitute a more suitable site than that presented as an alternative site within the MIR at Harmony Hall Gardens (AMELR013) for the following reasons: <ul style="list-style-type: none"> • The site is free from flood risk. • Water supply, foul connections and surface-water can all be dealt with. • The site is not located in or adjacent to an SAC, SPA, SSSI or RAMSAR. The site is within the NSA. <p>In terms of background information, the site is greenfield and there is no planning history related to the site. The contributor considers that the site has good access to public transport, employment and services. There are no known protected species on the site. Part of the site comes within the Battlefield of Darnick. A dwellinghouse located to the north east of the site is located within the Melrose Conservation Area. The tree belt on the northern boundary of the site is protected by a Tree Preservation Order. Access to the site would be at the north west of the site where it already exists. Access improvements may require tree removal. The site is located within the Countryside Around Towns area defined by Policy EP6 in the LDP 2016. Although realigning the development boundary to include this site would bring Darnick and Melrose closer together, the development boundaries would be no closer than their existing nearest points. Development at this location would square up a kink in the existing development boundary at this location. Viewed from areas above and around the locality, the contributor does not believe that this would lead to the coalescence of Melrose and Darnick. In addition to the above, the contributor contends that the site is:</p> <ul style="list-style-type: none"> • Deliverable within the short term because there is a market for the location • The site is located within the central hub • Provides a more suitable expansion to Melrose than the alternative land proposed at Harmony Hall Gardens (AMELR013) • Is of a suitable scale in size • Of minimal impact to its surrounds. (94) |
| Melrose | General | The contributor is of the view that there shouldn't be anymore housing developments in Melrose as it would spoil the aesthetics of a small town dependent on tourism. (272) |
| Morebattle | AMORE003, Land west of Teapot Bank | The contributor has submitted this site for consideration as a potential housing allocation. The contributor states the site is free from constraints and development at this location would be less disruptive and have less impact than the allocated housing site at West Renwick Gardens (AMORE001). (63) |
| Newtown St Boswells | ANEWT009 (Land South of Whitehill I) | The contributor proposes a site for a housing allocation within LDP2. The area proposed for development would extend from the existing southern boundary of the currently allocated land to the Selkirk Road (A699). The land comprises 37 hectares of gently sloping farmland. Development of the site would adopt and continue the previously established design parameters of creating housing zones between existing and proposed landscaped areas. The indicative site masterplan (submitted) proposes the location of a substantial tree belt along the site's southern boundary (to the A699) including at the south-east |

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| | | <p>boundary i.e. the location within closest proximity to the village of St Boswells. The proposed tree belt would be approximately 40 metres wide and provide a green link with existing tree belts in the locality. It would create a visual barrier to the development, and provide for enhanced leisure/recreation opportunities via the creation of woodland walkways and cycle paths. Additional landscape ‘pockets’ will be provided throughout the development, enhancing site identity and character and increasing amenity levels for the residents of the proposed housing.</p> <p>The existing allocated land is accessed from both the proposed new junction on the A68, and directly from Newtown St Boswells. The intention is to create a primary route through the site from these two points that will connect directly to the A699, offering residents of the proposed Newtown Expansion Area significantly enhanced access to the surrounding road network. The proposed extension to the planned Newtown Expansion Area offers indicative development capacity for circa 500 – 700 homes.</p> <p>Newtown St Boswells is located within the Central Borders Strategic Development Area (SDA), as defined by SESplan. The Central Borders SDA contains the largest settlements in the Borders, and the greatest concentration of local services and facilities. It has been identified as having capacity for further development in addition to that already identified in the approved development plan.</p> <p>The LDP Spatial Strategy places significant emphasis on the role of the Central Borders SDA as the primary focus for growth – and makes clear that the Western and Eastern SDAs perform “secondary roles” to the Central SDA within the spatial strategy.</p> <p>Newtown St Boswells is centrally located within the SDA and the settlement is highly accessible, both in terms of existing road connections and the Borders Railway line.</p> <p>The expansion of Newtown St Boswells is recognised by SBC as the best long-term solution in terms of its role in helping to meet the housing requirement and addressing development pressures within the Central Borders.</p> <p>The Council’s basis for adopting this position is in recognition that incremental additions to existing settlements would be unlikely to provide either the quantity of land required to meet the housing land requirement or the most suitable sites for development. (104)</p> |
| Newtown St Boswells | BNEWT002 (Land North West of the Holmes Barns) | The contributor considers this site offers a strong opportunity for employment/business land within one of the Borders fastest growing settlements. The Council has pinpointed Newtown St Boswells as a settlement for growth. It has substantial new housing planned. It is considered that new commerce around the town must be proactively planned for. Given the active frontage on the A68 and interest |

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| | | shown by CW Properties, the contributor considers that the subject site represents a strong opportunity for employment uses. Alternatively, the site could be seen as a form of Phase 1 that then leads to the currently allocated lands adjacent. The site is available for development for this use. The subject site again would face onto the major urban expansion located on lands opposite and would, in time, naturally integrate into the new expanded settlement. The lands provide an opportunity to assist in bolstering the overall business case in extending the railway onto Hawick/Carlisle and economic development in general. CW Properties are a locally based established development company who would welcome the opportunity to develop this site for a range of employment uses. (136) |
| Newtown St Boswells | General | The extension of the Borders Railway southwards to Hawick via Newtown would help facilitate the future expansion of St. Boswells/Newtown. (7) |
| Northern Housing Market Area | Scottish Water | The contributor states that they will support any preferred or additional Housing Land Supply sites emerging from the report. They accept that there are pressures to identify land for development near or next to our treatment works. Scottish Water would like to point out that they are currently planning to deliver water growth investment in and around Peebles to ensure their existing and future customers continue to receive the high quality service which they have come to expect. (323) |
| Northern Housing Market Area | Western Borders Rural Growth Area | The current Adopted LDP identifies potential longer term sites south west of Whitehaugh and north west of Hogbridge, and these are dependent on the provision of a new bridge over the River Tweed. The MIR offers another housing site east of Cademuir Hill (SPEEB009) and a mixed use site west of Edderston Road (SPEEB008). The alternative to development south of the river seems to be mixed use development at Eshiels (MESH1001 & MESH1002) and/or Cardrona (SCARD002). The Council's position of the prospects of a second bridge is unclear, is the Council in favour of a new bridge to allow development on the south side or not? Does the Council prefer housing on the south side of the Tweed or on 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 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, it is suspected that many people from Peebles/Cardrona travel to the Bush area, north of Penicuik and there may be possibilities for satellite agri-forestry research/businesses in Eshiels/ Cardrona. (7) |
| Northern Housing Market Area | Western Borders Rural Growth Area | The contributors state that they are concerned that the MIR does not address the current situation in the Peebles area (including Eddleston, Eshiels, and Cardrona). It is considered that the extent of housing development that could come forward goes against the current SESplan and the current adopted LDP, in that the MIR does not spread that development beyond Peebles into other main settlements. Furthermore, the MIR notes that it is anticipated that LDP2 will not require a significant number of new |

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| | | <p>sites; the built and natural heritage of the Borders must be protected and enhanced; due to potential flood risk and the need for a second bridge prior to any housing land being released there are limited options at this time however, the contributors state that MIR identifies sites for considerable development for example at Eshiels and Cardrona that seem to contradict the Council's identification of the Scottish Borders as being special for its landscape and attractive to tourism; The new proposals would be located prominently in the Tweed Valley and would impact directly on the visitors to tourist attractions such as Glentress, which the Council identify as being important.</p> <p>Both of these will also take up valuable agricultural land and will effectively be "stand alone" developments, which the Council say they are not contemplating. The Eshiels development dwarfs what is already there and the new Cardona site would be completely separated from the existing village by the main Borders east-west road and the River Tweed.</p> <p>In addition, in comparison to the Central Rural Growth Area, the western Rural Growth Area has considerable more new development identified. The contributor considers that Peebles is suffering heavily from this potential over development particularly when considering existing allocated and potential longer term sites within the LDP that have yet to come forward, as well as windfall sites.</p> <p>A realistic appreciation of the traffic that the streets can accommodate is important, with the extent of development proposed; there would be a requirement for a new supermarket, car parking – where would these be sited?</p> <p>The Tweed catchment has a long history of flooding and the new proposals also seem to contradict some of the excellent schemes 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 Kittlegairry 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. (30, 46)</p> |
| Northern Housing Market Area | Western Borders Rural Growth Area | <p>The contributors state that they are concerned about the substantial new housing planned for the Peebles area (including Peebles, Eshiels, Cardrona and Innerleithen) without due regard to the need / lack of preparatory work for enhanced infrastructure, including health, education, recreation, sewage, car parking and transport. All residents of these proposed developments will use the Tweed Bridge perhaps not as frequently as residents on the south side but traffic flows will still increase putting increased strain on the current bridge. Additional development will impact on the green open spaces. In addition, the new houses will attract more Edinburgh commuters and make the busy roads even more busy thereby making peak journey times to Edinburgh longer.</p> <p>Contributor 243 states that they are unsure why such a high need has been assessed in the Peebles area for housing development and what assessment measures have been used. The contributor is also unclear as to the infrastructure to support such developments.</p> |

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| | | <p>There are limited brownfield development sites in Peebles, this means expansion beyond the existing town centre. The uncertainty about the bridge is driving decision making about future development. The bridge issue needs to be solved first, not least because the High school lies to the south of the bridge and there have already been housing developments on that side in recent years. On that note there is no information as to how the schools in the area- particularly the High school could cope with increased families of school age, young people residing in the area. This needs to be addressed to convince the local public that the local amenities can cope with any increases in population.</p> <p>Contributor 237 states that the MIR refers to the impact on roads, health and social care services, and schooling in the Peebles area and acknowledges that all of these are currently stretched. However, there does not appear to be anything in the MIR which specifically addresses the additional infrastructure and services that would need to be put in place in Tweeddale and the surrounding area to support the proposed housing developments. This ranges from additional roads (in a network that is already very busy and subject to constant delays through necessary road repairs) through to healthcare such as access to GPs in an already over-stretched Health Service and Peebles High School is currently nearing capacity. In addition, the Socio- Demographic section states the Tweeddale area has an increasing aging population which by itself will put increasing pressure on health and social care services. Surely, such services need to be in position prior to further development otherwise there is a risk of lowering the quality of life for those currently living in Tweeddale.</p> <p>Contributor 80 also states that the Council has failed to develop the rest of the Borders particularly around the railway, and is directing most new development to the Peebles area, these proposals form no strategic plan and are random pieces of land, many of which will result in 'out of town' housing estates with no access to social and leisure facilities other than by car, this approach does not fit with the aims set out in the MIR. If completions have dropped to their lowest levels since 2005, why are the Council allocating so much land for development? The council should be focusing on affordable rented accommodation and attract inward investment. As much of the new housing will be aimed at commuters, it should be noted that public transport is limited and it takes 2 hours to reach the Gyle at Edinburgh. The A703 which provides access to Edinburgh is also in a terrible state of disrepair which the developments at Peebles and Eddleston will require to use for access to Edinburgh. A transport strategy to include public transport and a maintenance plan for the A703 is required especially with continued housing development along this route including development at West Linton and Penicuik.</p> <p>Contributor 90 states that they do not agree with the preferred options for additional housing. More than 80% of all proposed units identified in the MIR are located in the Peebles area. Whilst contributor 188 states that the Council should not try to concentrate so many new developments around Peebles.</p> |
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| | <p>Contributor 96 states that they are horrified at the number of housing sites proposed, being substantially all the sites identified for all of the Scottish Borders. These are in addition to the many sites already subject to housebuilding proposals. All this will do is provide more houses for long distance road commuters. This is particularly unnecessary when there is a lot of housebuilding taking place much closer to Edinburgh. These proposals are despite capital spending on schools, transport etc being in large part directed to anywhere but the Peebles area, such as the Borders Railway. Peebles has an imbalance between the amount of housing and the employment opportunities close by.</p> <p>Contributor 141 states that there has been discussion about getting another bridge for Peebles for years; however, despite no bridge the Council are still proposing hundreds of houses to the north of the River Tweed. Traffic on the High street and the bridge will get much worse. With this proposed new development, will there be a new school, new sewage treatment and new doctors? Houses are wanted in Peebles, not outside it.</p> <p>Contributors 172 and 185 states that current and estimated economic growth in the Borders relies heavily on tourism, including mountain biking. Building on open fields will surely ruin the scenic vista in Eshiels, Cardrona and Innerleithen, and will not enhance the rural development plan. It is counter to SBC policy ED7 of encouraging tourism.</p> <p>Contributors 185 and 197 state that they do not agree with the proposed housing, stating that the number proposed is disproportionate to the rest of the Scottish Borders. Focusing on Peebles takes a disproportionate amount of resource away from other communities which is not ethical or fair. Additional development in the area will put too great a strain on the infrastructure, attractiveness and amenities of the area. Additional development will increase traffic congestion on the A72, the proposals will remove land from agricultural use, there is the potential to increase flood risk, and the sites are located within the Special Landscape Area and will impact on the setting of the settlements and their character, and goes against LDP Policy PMD4. There will be a negative impact on biodiversity and on tourism. Climate change needs to be considered, and a long term approach taken. The developments will have a detrimental impact on the sewage process at Eshiels Recycling Centre along with the ability to process all of the waste associated with these properties. Additional development will blur the separation between Cardrona and Peebles. The majority of new residents will be commuters and this will impact on the roads between Eshiels and Edinburgh. There is a significant investment required in relation to Education. The local health service is stretched and additional development will compromise this further.</p> <p>Contributor 186 states that they do not agree with the housing proposals for Peebles. Furthermore they fail to see how building hundreds of new homes in a town that does not have the infrastructure to cope with it will improve the area. With the introduction of the increased nursery hours from 2020 the nurseries</p> |
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| | <p>will struggle to cope. Peebles is a commuter town, with a big draw for tourism with the biking at Glentress. The landscape is a big draw for visitors, building a massive housing development on the doorstep to Glentress will diminish its appeal. The lack of infrastructure and services should be addressed prior to additional development taking place.</p> <p>Contributor 193 states that they disagree with the options proposed.</p> <p>Contributor 235 states that they do not agree with the preferred options for the Peebles/Eshiels area. There is a risk of flooding properties below the sites suggested. There has and is continuous problems in heavy rain on the land and on the road. You haven't solved that yet, how will you? It will not improve tourism. Walkers, bikers, holiday makers come because the area is unspoiled. This will spoil it. There is already overcrowding in primary schools and the high school cannot take further pupils. Any more patients in the medical centre will severely affect the present population in Peebles and those you seek to bring in. The housing you want will be for the more affluent people from outwith the Borders. A few "affordable" houses thrown in will not solve housing problems for people who live here. Every house built will have a minimum of two cars, every business will have at least 2, as there is no other way to access amenities without one. That's a considerable increase in traffic. The road infrastructure is completely insufficient. There is still no plans to build the bridge that is sorely needed across the tweed to ease the traffic problems at the moment. The town could not cope with all the extra traffic. If you want to develop an area, sort out your infrastructure first roads, public transport, schools, medical care, water and sewage.</p> <p>Contributor 239 states that the burden for new development falls too heavily in the Peebles area at the expense both of other areas in need of strategic direction and at the expense of the "sense of place" of the existing settlement.</p> <p>Contributor 250 states that they do not believe that in relation to Peebles and Innerleithen additional housing sites should be required until the general infrastructure is improved.</p> <p>Contributor 257 questions why it is proposed to build so much in the Peebles area. Surely there are plenty of other towns that could stand development. The impressions they get is that the developers are pushing for more housing in the Peebles area.</p> <p>Contributor 291 considers that there is an over commitment to the west of this authority where provision is already very well established e.g. Peebles and Innerleithen.</p> <p>Contributor 317 states that it is considered that there is an over-reliance on large sites in the Northern</p> |
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| | <p>Housing Market Area, where deliverability within the LDP2 lifespan is uncertain given infrastructure constraints, potential questions over viability (given significant new infrastructure requirements) and lack of knowledge over landowner willingness, as highlighted within LUC's Report.</p> <p>Contributor 318 states that they consider that the Peebles area including Eshiels and Cardrona, is expected to bear the brunt of development which, they believe, should be spread across the whole of the Borders. There appears to be a gross imbalance between proposals for the Peebles area and the remainder of the Borders which is unacceptable and, they believe is contrary to Government policy. Why is the Peebles area being allocated a grossly disproportionate amount of sites and development? No evidence is offered to demonstrate that Peebles requires more housing of the numbers proposed. House builders will always be keen to build on greenfield sites especially in areas that are likely to be attractive and where houses can be easily sold; that however should not provide reason to cover large tracts of agricultural land with housing. That there is a requirement for more affordable housing is not in dispute, the types of housing likely to be developed in many of the proposed sites will not be affordable housing. What makes the upper Tweed valley unique is that the town, central to this area, Peebles, is an attractive and vibrant town and also that the area is known for its natural beauty. If these long term proposals are allowed to be developed then we will have ribbon development down the Tweed Valley along the course of the A72. This type of development would be wrong in principle and wrong in practice. It would detract from the natural environment which is vitally important to the success of the area as a tourist destination. Much is said in the MIR about the need for sustainable economic development; this type of ribbon development will most certainly, and adversely, affect the long term future of this area. It should be very clear to planners that the only link between Peebles and Edinburgh is the A703 to Leadburn and then with a choice of two routes. This road is highly susceptible to adverse weather conditions and it is not uncommon for the town to be cut off in winter.</p> <p>The contributor states that they know that, currently, over 60% of the working population of the Peebles area works outwith the town; most of these people rely on cars as their main mode of transport, others rely upon the bus services. Without significant improvement in the roads infrastructure further development would be deleterious. It must also be acknowledged that there is a great deal of traffic that flows along the A72, both east and west. Given that three major sites are being considered for Eshiels and Nether Horsburgh, there is little or no acknowledgement of the pressure on this road system. Also, public transport, particularly west from Peebles is deficient. The suggestion that the A72 should be diverted through a new development to create a High Street at Nether Horsburgh becomes even more ridiculous when the pressure on this road is taken into account. Currently there is a high demand in Peebles for car parking. Much of this demand is caused by people needing to travel into Peebles from outlying areas to do their general shopping and other business, an increase in that demand by another 1000 or so households will be difficult to accommodate. Any additional houses will lead to increased use of our shops and supermarkets; of course this is to be welcomed, there is a need for a vibrant town</p> |
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| | | <p>centre which appeals to residents and visitors. However, it is increasingly likely, that should these developments occur, at least one new supermarket would be required to service the whole area. Where this could be built is a moot point; as said, there are very few, if any, suitable sites for the development of supermarkets or indeed further leisure facilities. It is quite clear that the emphasis of this MIR is on finding land that developers will wish to build on and where houses can be easily sold. This means therefore that greenfield sites are preferable and that the desire of developers outweighs the needs of the communities affected and of the need for appropriate infrastructure to be in place. The contributor states that they believe that the needs of the existing residents of this Burgh should be met and considered before any further substantial development is considered or allowed. Indeed without a properly considered master plan no further large scale (e.g. over 20 houses) development should be permitted.</p> <p>(80, 90, 91, 96, 102, 141, 149, 172, 180, 185, 186, 188, 189, 193, 197, 201, 203, 223, 235, 237, 239, 243, 250, 257, 291, 300, 317, 318)</p> |
| Northern Housing Market Area | Western Borders Rural Growth Area – Alternatives to significant areas of development | <p>The contributor considers that the alternative to significant housing sites that should be considered is the small scale improvements to small towns eg derelict buildings on outskirts of Hydro in Peebles, unused shops (unused for a significant time periods) and use powers to purchase and revamp for business, commercial or residential purposes. This stops 'urban sprawl', improves the localities and utilises what can be eyesores and sad buildings. This may only net a few hundred of the required units but would save open fields being lost; Building a small new town somewhere on the Edinburgh Rd to the north of Eddleston. Most people in the Peebles area travel to Edinburgh for work and frequently for recreation. A properly planned new town with decent links and infrastructure would be an exciting project for developers and meet most of the needs in the MIR. (197)</p> |
| Northern Housing Market Area | Western Borders Rural Growth Area: Development Options Study | <p>Contributors 30, 90, 155 and 277 questions why a study was undertaken for the Tweeddale area but not any other area of the Borders, this has resulted in even more pressure for the Peebles area. What justification is there for singling out Peebles other than the belief that developers want to develop in the Peebles vicinity? That is neither a sufficient nor correct reason for singling out Peebles for special 'treatment' at the cost of the council tax payer.</p> <p>Contributor 73 also refers to the Western Rural Growth Area: Development Options Study which formed a background paper to the MIR and was not subject to the consultation, they also raised the issue of the lack of consultation on the document.</p> <p>Contributor 73 also states that in 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.</p> |

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| | <p>Contributor 73 also states that this is a key document since, as was quoted above, “The study findings have informed the potential site options set out in the MIR”.</p> <p>Contributor 73 also states that 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.</p> <p>Contributor 73 also states that 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.</p> <p>Contributor 73 also states that 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 improved - then, because it is so far outside the relevant timeframe, it should be excluded.</p> <p>Contributor 73 also states that 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.</p> <p>Contributor 73 also states that 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</p> |
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| | | <p>document. Why has it been included?</p> <p>Contributor 73 also questions why the MIR (and the Development Options Study) identifies sites south of the River Tweed despite known constraints relating to the roads and bridge.</p> <p>Contributor 80 states that the consultants of the independent report should be named, report released for review and should have been included in the consultation materials.</p> <p>Contributor 111 states that the Development Options Study should have considered site SPEEB005 in its consideration of potential sites.</p> <p>Contributor 114 states that the Development Options Study should have considered site APEEB0049 in its consideration of potential sites.</p> <p>Contributor 139 states that there is an indicative lack of thoroughness in the report, and there is also a lack of engagement with stakeholders. The contributor states that if the consultants had taken the time to visit Eshiels and had spoken to anyone who lives there, they would have found out who owns the land in a matter of minutes. This casual and cavalier attitude towards landowners and local communities contrasts with the impression given, throughout the LUC report, that developers were consulted in depth about their preferred sites, which totally skews the conclusions of Main Issues Report. It reads as if the Council's agenda is totally developer driven. This is short-changing taxpayers and makes a mockery of the process of consultation. (30, 73, 80, 90, 111, 114, 139, 155, 277)</p> |
| Northern Housing Market Area | Western Borders Rural Growth Area: Development Options Study | <p>It is noted that the Council commissioned Land Use Consultants to conduct a development options study and produce a report. The following three sites were then included as preferred options in Peebles: SPEEB008 Land West of Edderston Ridge, APEEB056 Land South of Chapelhill Farm , and SPEEB009 East of Cademuir. In addition two further sites at Eshiels were also included - MESH1001 Land at Eshiels I and MESH1002 Land at Eshiels II. It is noted that these sites are not located within the Strategic Rural Growth Area.</p> <p>The report recommended a total of nine sites in the Western Rural Growth Area with three of these located in Peebles. All sites which have been determined as preferred and alternative in Peebles appear to have been as a result of the LUC report. It does not appear that any sites have been successfully submitted for inclusion aside from the three recognised areas in the report. Ten other submissions have been made through the call for sites and they have all been considered to be excluded for a variety of reasons. (127 (1 of 3))</p> |

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| Oxnam | AOXNA002, Land to west of Oxnam Road | <p>The contributor requires a Flood Risk Assessment which assesses the risk from the Oxnam Water and small tributary which flows along the boundary. Due to steep topography adjacent/ through the allocation site, consideration should be given to surface runoff issues to ensure adequate mitigation is implemented. Site will need careful design to ensure there is no increase in flood risk elsewhere and the proposed development is not affected by surface runoff.</p> <p>Foul water must connect to the existing SW foul network however it is likely that this would require upsizing for any new development. The unnamed tributary which runs adjacent to the site should be protected and enhanced as part of any development. The site is opposite the Oxnam STW. Probably unlikely to give rise to issues as septic tank and reedbed system. (119)</p> <p>The contributor agrees with the conclusion that the site identified by reference AOXNA002 should be excluded as it believes this proposal could lead to gradual and unwelcome urbanisation. The contributor does not wish to see the proposed settlement boundary (shown at Figure 8 of the MIR) altered to include any portion of the field identified by site reference AOXNA002. (124)</p> |
| Oxton | AOXTO009 South West of Oxton | <p>The contributor states that if an area has to be identified as a potential site for additional housing, their preference would be for site AOXTO009, with the number of properties limited to 10/15 in total. In the interest of safety and to minimise significant increase in traffic along the road leading from The Loan out of the village and past Burnfoot Farm access via Main Street (i.e. through site AOXTO013) would appear to be the better route of access to such a development. (330)</p> |
| Oxton | AOXTO009 South West of Oxton; AOXTO010 Nether Howden; AOXTO011 Former Railway; AOXTO012 Heriotfield South; AOXTO013 West of St Cuthbert's View; AOXTO014 | <p>The contributor has worked in compiling the views of their community on potential development areas around the settlement of Oxton. The key findings from the work undertaken is that the majority of the people who would be directly impacted on having a development beside their property were against a development site. This is a natural bias, which people empathise with. This is reflected in the survey of preferred options. A small number of people said that Oxton and Channelkirk is big enough already. There was a strong agreement that any future development should be directly adjacent to the existing village boundary. There should not be a creation of a separate 'settlement' fields away. All theoretical sites have, environmental, utility and infrastructure challenges to be looked at and even before that there will be the desire of the existing landowners to want to sell the land for development to be ascertained. There is a will that if Oxton and Channelkirk is to expand and develop to this extent that they should facilitate, support and pursue the following:</p> <ul style="list-style-type: none"> • School/Hall/Shop – (The contributor asks if they can consider and re-look at a 'Hub' accommodating these within one facility?) • They also raise that the opportunity to secure developer contributions to go into a pool to help protect the school in the future by way of upgrading existing or providing a deposit towards a new one • Utilities – The contributor asks if they can negotiate with Gas and Broadband suppliers' for new |

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| | <p>North of Main Street; AOXTO015 Bridgend; AOXTO016 Oxton North West; AOXTO017 Oxton North East; AOXTO018 South of Justice Hall</p> | <p>opportunities (Would the utilities cope with the increased demand this volume of housing and people would place on them?)</p> <ul style="list-style-type: none"> • Roads & Paths - must be reviewed and developed to incorporate the future development and enhance the existing paths, pavements, roads and lighting. <p>Following a survey of around 70 People, site AOXTO009 came out as being the favourite for development, and this was result duplicated in a wider poll of which there were 426 members, and proximately 100 residents supported that site. That same poll also found that the site identified in the MIR – AOXTO010 came out second. Whilst the smaller survey found that site AOXTO010 came in as least favourite.</p> <p>Key comments that came out as a result of the smaller survey identified issues relating to:</p> <ul style="list-style-type: none"> • New Paths/Pavements (around Netherhowden) • Explore installing gas into the village as part of the plan • A68 junction is inadequate as is • No of house planned is too many for village and any A68 access. Smaller number overall with greater number of affordable houses • Huge need for mains gas – at present residents can't access dual-fuel deals and are held to ransom by LPG companies • Bus access must be protected • Need for road capacity to be considered – bridge at Netherhowden too narrow • Netherhowden road too narrow for increased traffic. • Infrastructure may not cope with increase. <p>The contributor also states that in relation to:</p> <ul style="list-style-type: none"> • Gas Pipe – they have now been able to ascertain that it is likely that the distance between a residential building and that pipe is 17m. A road could be constructed over it. • Roads and pavements – There are challenges with the existing roads that are undesirable or would need altered. The junction at Main Street and the width of The Loan with its ability to cope with additional traffic. However, if the landowner of site AOXTO013 would be willing to sell all/part then a new road could be built to Luckencroft? • There is lack of sufficient pavement at the junction at Netherhowden. There may sufficient verge to be able to complete a safe pavement connecting this site to Station Road. • Sewage and water waste – Would the capacity of the burn cope with the increase. <p>In relation to future opportunities, there is a desire to maximise on future developments by 'putting on the table' in the future the potential opportunity to incorporate a combined School/Hall/Shop – A Hub (Refer to site MOXTO001 Oxton South West under responses to MIR Question 6). (328)</p> |
| Oxton | AOXTO010, | The contributor supports taking forward the site for housing development with an indicative capacity of 30 |

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| | Nether Howden | units. (125) |
| Oxton | AOXTO010, Nether Howden | <p>The contributor states that the site has the potential for surface water flood risk and therefore recommends that this issue is taken forward through discussion with the flood prevention and roads department colleagues and Scottish Water, where relevant. It is noted that additional site specific information may only serve to identify that development at the site would be contrary to the SPP and the principles of sustainable flood management.</p> <p>All new developments should manage surface water through the use of Sustainable Urban Drainage Systems (SUDS). The contributor recommends that this requirement includes the use of SUDS at the construction phase in order that the risk of pollution during construction to the water environment is minimised.</p> <p>Foul drainage should be connected to the public foul sewer however given the number of units proposed there is likely to be inadequate capacity within Oxton stw without upgrading. (119)</p> |
| Oxton | AOXTO010, Nether Howden | <p>Contributor 329 states that in the past 20 years or so the settlement has doubled in size. This new housing is predominately in Justice Park with 40 houses and St Cuthberts View with 20. There is a small development of 5 houses currently being built in the old station yard. The key point here is that rather than Oxton getting even more large scale development any further developments should be on a smaller scale and larger developments sited elsewhere in the region. The contributor feels that any more large scale development will adversely change the character of the village. The contributor understands that in the last two LDPs it has been stated that development to the north and east of the village should be resisted, and that this is likely to be carried over into the new LDP. They have seen the reasons given for restricting development to the north and east and they are sensible.</p> <p>A further point is that the Netherhowden site is accessed from the minor road that runs past Netherhowden farm. This road runs from its junction with Station Road for .5 mile to join the A68 south of the Carfraemill roundabout. It is a single track road, with no pavement, that twists and turns and with little in the way of verge in places. It is used by walkers (with or without children or dogs), cyclists and an increasing number of vehicles. The increase in vehicle usage is because it is seen as a 'short cut' if going to or coming from the south on the A68 and contributes to the risks for the other users of the lane. A large scale development at Netherhowden would inevitably add considerably to the amount of traffic using this lane. It would be the obvious route to take if going to or coming from Lauder.</p> <p>As an alternative, a smaller number of 5 or 6 houses built in a cul-de-sac would be much more in keeping with other properties in the area. It could well be seen as 'infill' and would be much less obtrusive than a larger estate. Such a development would be similar to that currently being built, just across the road in the old station yard and would infringe less on the conditions restricting development to the east of the</p> |

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| | | <p>village.</p> <p>Contributor 330 states that they are concerned at plans to build 30+ houses in Oxton. They recognise that some development is inevitable and in some respects may be beneficial, they are against the level of development proposed not least due to the potential impact on nature, infrastructure, access and increase in traffic causing negative environmental impact and safety issues. The contributor states that they are strongly against the suggestion of building a significant number of houses at Netherhowden for the reasons mentioned above but if ultimately it is identified as a potential site for housing, they can see some benefit from a the building of a small number of properties (ideally 2/3 but no more than 4/5), ideally in a steading or cul-de-sac format.</p> <p>(329, 330)</p> |
| Peebles | APEEB049 South West of Whitehaugh | <p>The contributor supports the site's status as a longer-term housing site within the LDP2 MIR but they object to the site's exclusion as a preferred housing site as it is contended that the site is capable of coming forward in a shorter timescale and should therefore, be identified as an allocated housing site within the LDP2 Proposed Plan. The site is being promoted by Taylor Wimpey who have a proven track record of delivering, and selling, housing in Peebles. The momentum they have generated through the success of their other developments, including their adjacent Kingsmeadows site should be recognised. The site can contribute the Housing Land Requirement for the Peebles area.</p> <p>The contributor states that although the site is viewed as an acceptable site in principle - before the site could come forward (and be considered effective) SBC considers that a new bridge crossing (over the River Tweed) would be required alongside upgrading of Glen Road and a vehicular connection through to Whitehaugh; however, the contributor states that they strongly disagree with this. The contributor understands that the site will however, remain within the Plan as a longer term site, but if this is not the case they also wish to object in relation to its exclusion.</p> <p>It is considered that all the respective site requirements within the LDP1 Settlement Profile could be met - an outcome reaffirmed by the LDP2 MIR Site Assessment - and there are feasible solutions to resolve any technical constraints, largely relating to a second road bridge over the River Tweed and to potential heritage matters. The contributor has submitted an indicative layout for the site. (114)</p> |
| Peebles | APEEB054 East of Kittlegary View | <p>The contributor objects to the MIR in that it does not identify site APPEB054 as a preferred option and request that it is identified as a preferred mixed-use site within the LDP2 MIR and allocated as a mixed-use site in the LDP2 Proposed Plan. The contributor also states that the current arrangement in the MIR could effectively result in the removal of the site's safeguarded status as a potential longer term mixed-use site within the LDP1. The contributor understands that the site will however, remain within the Plan as a longer term site, but if this is not the case they also wish to object in relation to its exclusion. In addition, the LDP2 MIR Site Assessment states that their site is acceptable for development but that constraints relating to the potential requirement for a new crossing over the River Tweed should be investigated</p> |

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| | | before the site can be allocated. Again, based on technical assessment undertaken, this is a position that the contributor fundamentally disagrees with. (111) |
| Peebles | APEEB056 Land South of Chapelhill Farm | <p>The contributors support the inclusion of APEEB056 as a Preferred Option for housing.</p> <p>Contributor 101 states that land to the west of this site can be provided as additional or alternative sites for the provision of new homes.</p> <p>Contributor 206 states that whilst they do not think there is a need to identify more sites in Peebles, if any were to be identified this is the best option as it is on the north of the settlement, (there is significant possibility of interest in Peebles as a place to live for residents who might commute north). (6 (2 of 2), 65, 101, 206)</p> |
| Peebles | APEEB056 Land South of Chapelhill Farm | The contributor considers that there should be a larger allocation at this location instead of a site south of the River Tweed, as it would give easier access for commuters. (181) |
| Peebles | APEEB056 Land South of Chapelhill Farm | <p>The contributors note that the site requirements for this site lists that the preferred linkage route is between Kingsland Road and Dalatho Street thus adding to the Rosetta development for 100 houses thus bringing the total to 250 houses. Dalatho Crescent and Dalatho Street are narrow roads and the junctions to the Edinburgh Road are tight. Surely the ideal access to the A703 is to the north inside the boundary of APEEB056 forming a new road, bridge and a new junction to the A703 that will serve this site and the Rosetta development.</p> <p>Development at this location will impact aesthetically on the northern approach to Peebles. In addition 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.</p> <p>Contributor 80 states that the residents of this site will 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 is appropriate or safe.</p> <p>Contributors 111 and 112 states that there are clear constraints that would compromise the effectiveness and delivery of this site, namely the issues around roads.</p> <p>Contributor 112 also states that development at this location would appear incongruous and detached from the rest of Peebles and would have a detrimental impact upon the landscape setting of the town.</p> |

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| | | <p>Contributor 155 states that they do not agree with the identification of this site. There is no way Peebles infrastructure can cope with these additional houses which has to be considered in conjunction with the proposed developments at Eshiels. An additional 500-1000 houses without investment in permanent solutions to roads, schools and health care facilities defies logic. The impact on infrastructure of new development needs to be investigated objectively. A simple letter from the roads, health or education department stating that the infrastructure can absorb new houses and their occupants is not sufficient unless current levels and proposed new levels are properly quantified and compared; real numbers need to be provided.</p> <p>Contributor 197 states that this site should be removed as Peebles has made a huge contribution to the housing stock over the years, in addition the current services and infrastructure including the bridge are already over stretched.</p> <p>Contributor 236 states that they do not agree with the identification of this site. As noted, this is a prominent site that has been resisted for 15 years and for good reason. There is a good defensible boundary next to Miller development.</p> <p>Contributor 317 states that whilst the site is located within the Western Rural Growth Area, it is noted that the development pressure on the northern side of the town is already high with the proposed significant (150 unit) 'preferred' allocation on land south of Chapelhill Farm following swiftly on top of the allocations (and recent development) of several adjacent sites accessed off Rosetta Road. The northern link to the A703 remains single track in nature and the required alternative access solution to provide a suitable link appears to have undergone minimal investigation. Indeed, the Roads Planning Officer, in the MIR Site Assessment, highlights potential third party landownership issues with achieving a satisfactory access, although a new link with the A703 is stated as essential within the MIR 'Site Requirements'. It is thus unclear if this site is able to be developed within the LDP2 timeframe.</p> <p>Further, it is considered that a development at this location would appear incongruous and detached from the rest of Peebles and would have a detrimental impact upon the landscape setting of the town. It would be highly visible from the A703, a situation which would be exacerbated if development took place on the sloping western part of the site. The site is capable of coming forward in the short term. (30, 46, 80, 111, 112, 155, 197, 236, 317)</p> |
| Peebles | APEEB056 Land South of Chapelhill Farm | <p>The contributor states that development of this site would cause the destruction of ancient pasture; increases the risk of pollution to the River Tweed and its tributary; will affect local wildlife and tourism; building has already taken place in the area, which will speed run-off during heavy rain, putting the area downstream at higher risk of flooding. The topography of Peebles and its environs mean the town and its transport links are very vulnerable. The B7062 is not suitable for large vehicles and in places is barely</p> |

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| | | <p>wide enough for two cars. The A703 is still only a double track road that can be very fast and as the main route out of the Borders is very busy. The A72 is already busy and fast, it is frequently closed due to accidents, is narrow in places, causing bottlenecks and risking lives if emergency services need to get through. There is no alternative route. It is also vulnerable to flooding and risk of erosion by the Tweed, and development on agricultural land will exacerbate flooding. With the rise in the number of users on the A72 there will be an increase in the number of accidents particularly with cyclists. This site would also require to use the Rosetta/Back Road which is again narrow and in poor repair and barely able to cope with current usage. With the increase in population in the area, it will result in further stretching existing services and facilities including education. The proposal will also result in an increase in the number of houses, businesses and their occupants doing more journeys to get to work, shops, etc as there are limited facilities in the area thereby increasing our carbon footprint. The development on agricultural land used for food production is unwise and may impact on food security. (108 (2 of 2))</p> |
| Peebles | APEEB056 Land South of Chapelhill Farm | <p>The contributor states that if this site were to be included within the LDP2, this would require the extension of the town boundary and represents the creeping urbanisation of our landscape. This site can only be accessed from two directions, from the north along an inappropriate narrow country road or from the south along an already highly congested Rosetta Road in Peebles.</p> <p>Apart from infrastructure issues, the issue of access is of serious concern. It is suggested within the MIR that a new bridge would be required over the Eddleston Water between Kingsland Square and Dalatho Street with access then onto the Edinburgh Road; this is said to be the preferred route. Dalatho Street in particular is a narrow street and not suitable for the level of traffic that could reasonably be generated. The junction then with Dalatho Street and Edinburgh Road is also problematic; this is a busy main road and whether such a junction could be engineered to accommodate increased traffic would require very careful consideration. If this site were to be included an alternative route for a new crossing over Eddleston Water would need to be considered. (318)</p> |
| Peebles | APEEB056 Land South of Chapelhill Farm | <p>The contributor states that they agree with the identification of site APEEB05. (It is considered that the contributor is actually referring to site APEEB056). (283)</p> |
| Peebles | APEEB056 Land South of Chapelhill Farm | <p>The contributor recommends that a developer requirement is attached to the site to ensure that a maintenance buffer strip of at least 6 metres wide is provided between the watercourse and built development. Additional water quality buffer strips may be recommended in addition to the maintenance buffer strip depending upon specific water quality pressures. The watercourse (tributary of the Eddleston Water) adjacent to the site should be protected and enhanced as part of any development.</p> <p>The contributor supports the development requirement for a Flood Risk Assessment (FRA) to be undertaken prior to development occurring on the site. The contributor states that a FRA which assesses the risk from the Eddleston Water and small watercourses which flow along the southern and north</p> |

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| | | <p>eastern boundary. Consideration will need to be given to bridge and culvert structures within and adjacent to the site which may exacerbate flood risk. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Due to the steepness of the adjacent hill slopes the contributor also recommends that consideration is given to surface water runoff to ensure the site is not at risk of flooding and nearby development and infrastructure are not at increased risk of flooding.</p> <p>The contributor states that the site has the potential for surface water flood risk and therefore recommends that this issue is taken forward through discussion with the flood prevention and roads department colleagues and Scottish Water, where relevant. It is noted that additional site specific information may only serve to identify that development at the site would be contrary to the SPP and the principles of sustainable flood management.</p> <p>All new developments should manage surface water through the use of Sustainable Urban Drainage Systems (SUDS). The contributor recommends that this requirement includes the use of SUDS at the construction phase in order that the risk of pollution during construction to the water environment is minimised.</p> <p>Foul drainage from the development should be connected to the existing SW foul sewer network (although the site is just outwith the current sewered catchment). The watercourse (tributary of the Eddleston Water) adjacent to the site should be protected and enhanced as part of any development. (119)</p> |
| Peebles | APEEB056 Land South of Chapelhill Farm | <p>The contributor states that as the Council have identified this site for housing, it is clear that they consider that this area of Peebles can make an important contribution to the Council's housing supply. It is therefore important that a comprehensive charging mechanism is in place to deliver the necessary infrastructure.</p> <p>It is noted that the contributor also makes comments regarding two allocated sites within the Adopted LDP that are not subject to this consultation i.e. APEEB044 and MPEEB006 and in particular the requirement for a new bridge. It is noted that this issue is being dealt with under Policy IS2. (Also the contributor has also submitted a new site for residential use – APEEB057). (126 (1&2 of 3))</p> |
| Peebles | APEEB056 Land South of Chapelhill Farm | <p>The contributor states that the outlying and linear nature of the site is likely to result in development that is physically and perceptually detached from the rest of Peebles. The general sense of openness and the rolling nature of the topography could also accentuate these issues. In overall terms the contributor highlights that this site, even with landscape planting and retention of stone walls, could result in a settlement extension which appears incongruous and detracts from the existing landscape setting of</p> |

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| | | <p>Peebles.</p> <p>The western part of the site is on a slope that would require significant cut and fill to achieve development platforms. Development of this part is likely to intrude on views from the A703 across to Hamilton Hill and the setting of the Cross Borders Drove Road. If allocated, the contributor suggests that the western part of the site should not be included and the rest of the allocation should be subject to the following site requirements:</p> <ul style="list-style-type: none"> • Active frontages along the Chapelhill Farm road. • Pedestrian and cycle access and links to existing networks to the town centre should be established. • Boundary planting along the eastern boundary should be established to maintain the rural setting of views from the A703. (213) |
| Peebles | APEEB057 Rosetta Road Caravan Park | <p>The contributor seeks the allocation of the site for residential development. They state that the redevelopment of the Rosetta site for a mixed use development including residential and leisure is currently unviable due to the Scottish Borders Council's requirement for a vehicular link over the Eddleston Water between Rosetta Road and the A703 (The Dalatho Street Bridge).</p> <p>An allocation for housing with a capacity of 280 houses would enable the level of contributions required to deliver the Dalatho Street Bridge. Given the holiday park will regrettably have to close shortly unless this position changes, the entire site will regrettably become vacant and unused. The only viable alternative economic use for the site would be for residential development alone. There has been a substantial increase in the housing land requirement set out with the Proposed SESplan Examination Report (July 2018) and SBC requires housing sites that can deliver in the short term. (126 (3 of 3))</p> |
| Peebles | APEEB058 Lower Venlaw | <p>The contributor seeks the allocation of the site for residential development for 22 units. The proposal for Venlaw here is explicitly for 22 dwellings on the site with the remaining land to be left open to public recreation. It is considered that the preferred options set out in the MIR are too long term and that this site can provide an effective site and address some of the anticipated housing shortfall. The proposal is for 22 homes that will be organised in a single row and limited to the lowest portion of the field.</p> <p>During times of great economic challenge, developers wish to operate in the most reliable markets to ensure a healthy return on any investment, it appears Peebles and the Borders can provide this through the allocation of this site.</p> <p>The inclusion of Venlaw does not provide capacity to solve all problems however, it provides an effective site which could be brought forward quickly to assist in delivery of the strategy.</p> <p>It is considered that this reduced site resolved many of the concerns previously raised. The proposed housing, infrastructure and landscape design is focused on integrating the development into the base of the slope along the lowest edge of the site. The built development and its roofscape will therefore sit at a very similar elevation to the adjacent and surrounding housing areas.</p> <p>The proposed housing development has limited impact on existing trees (one tree within the open grassland / meadow is removed and there are limited and localised tree removals associated with forming</p> |

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| | | <p>the vehicular access). Tree and mixed hedgerow plantings are proposed to integrate the development into the site and to provide a strong planted buffer between the existing and proposed housing. Concerns have been raised in previous submissions regarding the impact on amenity for those who reside in close proximity to the proposed development, many residents felt that there was a high probability of their view being impinged. The response to this concern is consistent with other areas, the scale of development has been significantly reduced with the site layout now not encroaching up the hill as was previously planned. This mitigation has been conducted in response to the recognised impact that previous applications would have had on resident's amenity.</p> <p>The approach to the design identifies a landscaped buffer between the houses and any development. The access road then provides further separation before the single row of houses. The houses are built into the slope so as to minimise the height above the properties on Edinburgh Road. The building line is approximately 17m from the rear gardens of the properties with a separation between the properties of 31m. The aspect of the site (west facing) ensures that southerly aspects are protected to ensure maximum sunlight to all properties.</p> <p>The Roads Planning section highlighted concerns in the PPP application that a proliferation of junctions in close proximity to the site access led to the application not receiving their support. It was further noted that mitigation measures provided to alleviate these concerns were not considered sufficient. The transport statement submitted in 2017 concluded that the trip generation from the site would be negligible. This statement was based on the understanding that development would consist of 40 units, this proposal is for 22 units. The development will utilise an existing access point and there is a reduction in the scale of the development which will significantly reduce the number of vehicles using this in comparison to previous submissions.</p> <p>It is noted that the contributor also refers to allocated sites and potential longer term sites contained within the adopted LDP that are not subject to this consultation. (127 (1, 2 & 3 of 3))</p> |
| Peebles | General | <p>The contributors object to the proposed number of housing developments in the Peebles area. This is an unbalanced and ill thought out plan, without due regard to local support services and amenities. Services and facilities in Peebles are already stretched and simply could not cope with a larger population, such as schools and the medical centre/health services, and the sewage system. The High Street and the bridge cannot cope with the current volume of traffic, parking is very difficult particularly for the disabled to find and there are no extra sites available.</p> <p>The roads around Peebles and Eshiels are now much busier than they used to be. In the event of a blockage on the A72 at Dirtpot Corner, a greater population would be unable to access Borders General Hospital. There is limited public transport. The MIR fails to address what needs to be done to resolve these issues.</p> <p>Excessive housing development will ruin the attractiveness of the town, and turn Peebles into a dormitory town.</p> |

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| | | <p>Development should be more evenly spread out. Further development should only be considered once existing infrastructure has been improved to deal with proposed and potential developments. It is too easy to respond to the demand of developers.</p> <p>Contributor 36 notes that traffic congestion is an issue at several points of the town including Caledonian Road, The Old Town and the High Street.</p> <p>Contributor 108 also states that Peebles has borne the brunt of housing developments in the Borders over this last 10 years. To force the community to accommodate the majority of all the proposed housing developments in the Borders is unacceptable. At worst, it should bear only a small proportion of the intended developments; at best it should be excluded from any further housing development on the grounds that it has already been forced to accept more than its fair share. It is in imminent danger of becoming a dormitory town for Edinburgh. Peebles is already big enough. If Edinburgh has a lack of affordable housing it must address that issue not impose the problem to other areas. Although it is not actually stated in the MIR report, there seems to be an indication that in future road expansion might take place along old railway tracks, currently under use/development as cycling, walking and riding routes. These are of great importance to residents and visitors alike for recreation, and their loss would be highly detrimental to recreation in the area.</p> <p>Contributor 145 states that they disagree with future housing development within Peebles. The sites preferred have minimal access and those south side of the Tweed struggle with poor highways infrastructure. Peebles as a town is already struggling with school numbers, availability of health professionals, and poor utility and infrastructure.</p> <p>Contributor 147 states that whilst housing is a main issue, continually building houses without considering the infrastructure needs of schools, doctors and other public services cannot go on. Peebles cannot cope with more houses without addressing these demands. Whilst these sites could be considered viable they are not viable without significant improvements in infrastructure. Road infrastructure is not capable as is pointed out by the need for a new bridge. Public transport needs serious review with the capacity of the A703/A701 roads to Edinburgh for more traffic highly questionable. Consideration of re-instatement of the railway to Edinburgh should be considered as a high proportion of new house owners are commuters.</p> <p>Contributor 151 states that there seems to be a disproportionate amount of properties proposed in Peebles. Is there any mention of the infrastructure development alongside this?</p> |
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| | | <p>Contributor 206 states that with a massive over supply of sites, there is a risk that development will occur in locations that are not the first preference of the Council, in identifying large numbers of sites also results in stirring up unnecessary anxiety amongst the Borders population. The resultant fuss about sites diverts focus from the real needs which are now chronic underinvestment in services and infrastructure to meet existing housing. Schools, roads and medical facilities are top priorities. The provision of these should be the main issues not more housing.</p> <p>Contributor 231 states that they agree that development should not take place on any land that is liable to flooding. Any additional housing needs to match infrastructure capacity. Should the plan not identify possible sites for a new high school, health centre and second crossing over the Tweed? If sites for a High School and Health Centre are not identified then does that mean thinking at this time envisages redevelopment on existing sites?</p> <p>Contributor 236 states that the MIR already makes reference to the Community Planning partnership, but there needs to be far better asset management planning regarding education, health and business development; there is a public perception that it is not joined up and in Peebles all we get is housing with Peebles taking a disproportionate hit.</p> <p>Contributor 227 states that they consider existing infrastructure around Peebles cannot stand further strains, health care and schools. Traffic along the A72 will increase and bottle neck into Peebles.</p> <p>Contributors 261 and 285 disagrees with the number of new houses planned for Peebles. (16, 18, 25 (2 of 2), 36, 108 (1 & 2 of 2), 139, 145, 147, 150, 151, 155, 166, 167, 172, 184, 197, 198, 206, 207, 216, 217, 227, 229, 231, 236, 241, 261, 265, 269, 270, 271, 276, 283, 285, 292, 298)</p> |
| Peebles | General | <p>The contributor states that Peebles has been allocated a site for 150 units and a further long term site which pro-rata has capacity of 250 units or more. This appears to be succumbing to the pressure of house-builders and market demand rather than need. Clearly Peebles is now a commuter town for further afield, in particular Edinburgh. It is also a very attractive town environment. (24 (2 of 2))</p> |
| Peebles | General | <p>The contributor states that the capacity of not only education facilities but nurseries, health facilities and leisure facilities should be taken into consideration ahead of compiling LDP2.</p> <p>Given the constraints around the requirement for a new bridge, LDP2 should not include any sites south of the River Tweed at Peebles for either housing.</p> <p>It is not acceptable for the MIR to state 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 the capacity of existing infrastructure has been increased to catch up with the existing population, and any subsequent new development is demonstrated to be supported by a financed</p> |

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| | | <p>infrastructure plan that is endorsed by providers and Peebles Community Council as adequate. The contributor also refers to the Western Rural Growth Area: Development Options Study which formed a background paper to the MIR and was not subject to the consultation, they also raised the issue of the lack of consultation on the document.</p> <p>The contributor also questions why the MIR (and the Development Options Study) identifies sites south of the River Tweed despite known constraints relating to the roads and bridge. (73)</p> |
| Peebles | General | <p>Contributor 158 states that all housing in Peebles should be removed until the lack of provisions in the schools, doctors etc is resolved. Peebles does not have the infrastructure to support any more houses.</p> <p>Contributors 175 and 179 states that there should be no further housing developments in Peebles until road and parking infrastructure is greatly improved as well as material upgrading of existing education, health facilities and sewage treatment plant.</p> <p>Contributor 178 states that the proposed developments of approx 1000 houses in Peebles should be put on hold until a new High School with additional teaching resources is in place.</p> <p>Contributor 200 states that they do not see a need for the proposed developments in Peebles. Don't take the town beyond its current geographical limits.</p> <p>The removal of housing allocations from one area cannot be supported if it increases pressure for more development in the Peebles area. Peebles has taken its share of development over the last 10 years.</p> <p>Contributor 243 states that they consider that Peebles needs to be thought through again as what is driving this is developers needs within commuting distance of Edinburgh and a lack of existing infrastructure such as the uncertainty of the bridge and the connection with the south side of Peebles.</p> <p>Contributor 282 states that they have concerns about the infrastructure in Peebles. In particular the health and education provision which is already stretched. Accurate projections are required to allow the school estate to be enlarged and to ensure that the level of developer contributions will be adequate to support the development required at the schools. There needs to be a holistic strategy for the town given the combined quantum of housing in current applications and proposed in the LDP is c900 units. This combined with the other proposed housing developments within the high school cluster will impact significantly on the high school which is already at c90% of capacity with areas of condition and suitability. Accurate roll projections and adequate developer contributions will be essential. The contributor states that it is their view that there should be a masterplan for the town to support this development. It is clear there is demand for Peebles given its proximity to Edinburgh - this should be</p> |

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| | | <p>masterplanned to ensure the infrastructure is expanded in line with the housing.</p> <p>Contributor 292 states that the proposal to build around 1000 houses in the Peebles area is not viable, and they do not agree with the proposal. The MIR shows that SBC planning Department know that developers will be attracted to Peebles and takes the pressure of that department giving them an easy way to get the numbers of houses built without too much work and satisfying the Scottish Government mandate. (158, 175, 178, 179, 200, 201, 243, 282, 292)</p> |
| Peebles | Peebles and Constraints South of the River Tweed | <p>The contributors states that they disagree that there is a need for a second bridge prior to any housing being released on the southern side of the River Tweed. They also state that they do not consider that this is a prerequisite for future development nor does it limit options within this location given that this perceived technical constraint (relating to bridge capacity) can be overcome, particularly in the short term. The contributor also objects to the statement in para 4.5 of the MIR that flooding and traffic congestion issues restrict the development of any sites on the Southern side of the River as these potential constraints could be overcome particularly for smaller sites or sites currently within the planning system. (111, 114)</p> |
| Peebles | Peebles and Constraints South of the River Tweed & Effective Land | <p>Peebles is extremely attractive to developers due to its marketability, this has not been recognised in the MIR as a lack of effective allocation. There appears to be a clear focus on the south side of the River Tweed, however, it seems the bridge requirement is likely to provide an immovable barrier for some time though. Rather than adapt the Council have stagnated and are relying on ineffective sites, this is not consistent with policy which urges local authorities to try something new in their efforts to deliver housing. Sites SPEEB008 and SPEEB009 do not provide an indicative capacity however, are of a scale which indicate that development will be significant for Peebles. Both sites lie on the south side of the River Tweed and therefore will have significant impact on traffic in Peebles and require the building of a new bridge to address the subsequent increased capacity of the road network. As well as these developments, a further seven have been previously allocated and are proposed to remain in the LDP which all lie south of the river. Cumulatively these developments will have a profound impact on the traffic crossing the river and ultimately not be sustainable for the town of Peebles without significant infrastructure investment.</p> <p>Contributor 181 states that there should be no building on the south side of Peebles until such time as a new bridge is constructed.</p> <p>Contributor 203 asks what happened to the bridge proposal? This would open up opportunities without affecting the town centre too much.</p> |

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| | | <p>Contributor 273 states that they would not support land on the south side of Peebles being allocated for housing or business use as the access roads are already struggling to cope with current developments and cannot handle more traffic. A particular issue is Caledonian Road which services the Fire and Ambulance Stations and is already effectively made single file due to current residential parking.</p> <p>(127 (1 of 3), 181, 203, 273)</p> |
| Peebles | SPEEB009 East of Cademuir Hill | <p>The contributors state that Bonnington Road is narrow and has sharp bends and two difficult junctions at the school leading to Springhill Road, has already too much traffic. The contributors also add that they are concerned at the viability of the farm in the future with this proposal as well with the potential for further development to take place to the south of this site. It is also noted that the proposals go against policy ED10 Protection of Prime Quality Agricultural land. In addition this site is also within the Special Landscape Area and development at this location would be damaging to that designation. In addition 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.</p> <p>Contributor 111 states that there are clear constraints that would compromise the effectiveness and delivery of this site, namely the issues around landscape and roads.</p> <p>Contributor 127 states that the site has its challenges which cannot be seen to be overcome during the plan period. These will ultimately render the site ineffective.</p> <p>Contributor 145 states that they strongly disagree with the allocation of this site, given the narrow roads, existing drainage issues and lack of pedestrian facility. Bonnington Road at the High School is narrow and is daily bottlenecked. Additional traffic will exacerbate this issue more and place significant impact on the already congested junctions and the Tweed Bridge.</p> <p>Contributor 155 states that they do not agree with the identification of this site. There is no way Peebles infrastructure can cope with these additional houses which has been considered in conjunction with the proposed developments at Eshiels. An additional 500-1000 houses without investment in permanent solutions to roads, schools and health care facilities defies logic. The impact on infrastructure of new development needs to be investigated objectively. A simple letter from the roads, health or education department stating that the infrastructure can absorb new houses and their occupants is not sufficient unless current levels and proposed new levels are properly quantified and compared; real numbers need to be provided.</p> <p>Contributors 157 and 226 state that they do not agree with the preferred option for Peebles Longer Term on page 72. However, it should be noted that the contributor refers to site 'SPEEB004' in their submission</p> |

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| | | <p>but it is considered that they are actually referring to 'SPEEB009' which is identified on page 72 of the MIR. The contributor continues by stating that development of this land would encroach upon an area of particular outstanding natural beauty and require considerable infrastructure development e.g. new access road etc. Development of the upper field to the north of Bonnington Road would also be excessively visible and very near to a clean water treatment works.</p> <p>Contributor 197 states that this site should be removed as Peebles has made a huge contribution to the housing stock over the years, in addition the current services and infrastructure including the bridge are already over stretched.</p> <p>Contributor 200 states that development of this site is an awful idea, there are not the businesses being created in Peebles to warrant extra housing, and development here will impact on the roads near the school.</p> <p>Contributor 213 states that this site is physically detached from Peebles and appears unlikely to be developable according to principles being established by the MIR, particularly in relation to sustainable places. If allocated and developed it may lead to further future development along this road, further establishing a sprawling development pattern of places that have little relationship to the town and which are heavily reliant on car use.</p> <p>Contributor 221 states that they object to the inclusion of this site as there is no need for additional housing following major recent developments and unused existing sites, the infrastructure is insufficient to cater for further housing growth particularly in relation to doctors surgeries and schools. Access to the site from the existing road is not safe and planned new roads would damage the environment. The site itself represents an unnecessary erosion of the Borders countryside. (30, 46, 111, 127 (1 of 3), 145, 155, 157, 197, 200, 213, 221, 226)</p> |
| Peebles | SPEEB009 East of Cademuir Hill | <p>The contributor states that development of this site this would cause the destruction of ancient pasture; increases the risk of pollution to the River Tweed and its tributary; will affect local wildlife and tourism; building has already taken place in the area, which will speed run-off during heavy rain, putting the area downstream at higher risk of flooding. Traffic from the proposed development will have to access the area via a junction that is already difficult and dangerous, and have to use a bridge that is already vulnerable. This area already sees frequent traffic jams – as the emergency services also need to use this road makes this area highly unsuitable for further development. The topography of Peebles and its environs mean the town and its transport links are very vulnerable. The B7062 is not suitable for large vehicles and in places is barely wide enough for two cars. The A703 is still only a double track road that can be very fast and as the main route out of the Borders is very busy. The A72 is already busy and fast, it is</p> |

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| | | frequently closed due to accidents, is narrow in places, causing bottlenecks and risking lives if emergency services need to get through. There is no alternative route. It is also vulnerable to flooding and risk of erosion by the Tweed, and development on agricultural land will exacerbate flooding. With the rise in the number of users on the A72 there will be an increase in the number of accidents particularly with cyclists. With the increase in population in the area, it will result in further stretching existing services and facilities including education. The proposal will also result in an increase in the number of houses, businesses and their occupants doing more journeys to get to work, shops, etc as there are limited facilities in the area thereby increasing our carbon footprint. The development on agricultural land used for food production is unwise and may impact on food security. (108(2 of 2)) |
| Peebles | SPEEB009 East of Cademuir Hill | The contributor states that it is not unreasonable to assume that this site would be earmarked for about 300. Again infrastructure issues are highly relevant. This site is in an area designated as a special landscape area and is inappropriate for a number of reasons; access to this site can only realistically be achieved along Bonnington Road in Peebles. Access to Bonnington Road is essentially along Springhill Road. These roads are not suited to high volumes of traffic that will be generated by 300 houses. It is suggested within the MIR that to address the issues of access to this site, that a new road would be required linking this site to Kingsmeadows Road, presumably to meet up with a second crossing over the River Tweed. This proposal seems to be unrealistic and probably unworkable. (318) |
| Peebles | SPEEB009 East of Cademuir Hill | The contributor states that they agree with the identification of site APEEB009 East of Cademuir Hill. (283) |
| Peebles | SPEEB009 East of Cademuir Hill | The contributor states that they are concerned about site SPEEB009 East of Cademuir Hill. The contributor states that they are not against there being further development as they live in a new house in this area but they are concerned about the access and in particular the requirements for new roads from Glen Road and Kingsmeadows Road. It would be unacceptable for this new development to be accessed from Glen Crescent which is already the only means of road access to Jubilee Park which I understand residents are already wanting a 20 mph zone. A road link to Kingsmeadows Road is also concerning given the impact on the drove road and the Cut. Given the current High school access for buses, consideration should also be given to improving Bonnington Road and Springwood Road - particularly if the school traffic is to increase with an expanding roll. (282) |
| Peebles | SPEEB009 East of Cademuir Hill | The contributor supports the development requirement for a Flood Risk Assessment (FRA) to be undertaken prior to development occurring on the site. The contributor states that a FRA which assesses the risk from the Haystoun Burn and small watercourse which flows on the boundary of the site. Consideration will need to be given to bridge and culvert structures within and adjacent to the site which may exacerbate flood risk. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Due to the steepness of the adjacent hill slopes we would also |

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| | | <p>recommend that consideration is given to surface water runoff to ensure the site is not at risk of flooding and nearby development and infrastructure are not at increased risk of flooding. The contributor states that the site has the potential for surface water flood risk and therefore recommends that this issue is taken forward through discussion with the flood prevention and roads department colleagues and Scottish Water, where relevant. It is noted that additional site specific information may only serve to identify that development at the site would be contrary to the SPP and the principles of sustainable flood management.</p> <p>All new developments should manage surface water through the use of Sustainable Urban Drainage Systems (SUDS). The contributor recommends that this requirement includes the use of SUDS at the construction phase in order that the risk of pollution during construction to the water environment is minimised.</p> <p>Foul water must connect to the existing foul sewer network for Peebles. There is an unnamed tributary /the cut to the south and east of the proposed site which should be protected/ enhanced as part of any development. Site appears to be next to a reservoir/works. (119)</p> |
| Reston | AREST005 Land East of West Reston | The contributor states that the site requirements of additional planting could be an attractive feature of this allocated site, should it become a preferred option for housing. They suggest to ensure that planting will be with native trees, which are sourced and growing in the UK. (199) |
| Reston | AREST005, Land East of West Reston | SEPA advise that foul water must be connected to the existing foul sewer network. Scottish Water should confirm any capacity issues. (119) |
| Romannobridge | AROMA004 Halmyre Loan South | <p>The contributor seeks the allocation of site AROMA004 for housing with an indicative capacity of 11 units. The contributor notes that they submitted a site at this location (with a different boundary) as part of the Call for Sites for the Supplementary Guidance on Housing and makes reference to the site assessment undertaken at that time.</p> <p>The contributor notes that there is known difficulty with securing short and medium term allocations for residential development within the Northern Housing Market Area generally. The '<i>Western Rural Growth Area: Development Options Study</i>' encompasses much of the Northern Housing Market Area and was commissioned to identify and assess options for housing and business and industrial land within Central Tweeddale over an area stretching from Eddleston to beyond Walkerburn. It is acknowledged that Romanno Bridge lies to the west of the Rural Growth Area (RGA), (as identified in SES Plan Proposed Strategic Development Plan) but it does lie within the Northern Housing Market Area.</p> <p>There are no known insurmountable constraints to development of the site. (112)</p> |
| Romannobridge | Romannobridg e Infill | The contributor seeks development on an area of land within the Development Boundary of Romannobridge. The area was formally subject to planning application 11/00696/PPP for the erection two |

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| | | dwelling houses that was refused. (1 (1 of 3)) |
| Selkirk | ASELK030 (Land to the West of Calton Cottage) | Object to the exclusion of the site from the MIR. The following points must be considered: <ul style="list-style-type: none"> • Although the site lies outwith the settlement boundary of Selkirk, the bus and footpath routes could be extended slightly to ensure that the site is not detached from local amenities in the town. • Road infrastructure could be constructed in order to link the site with the existing road infrastructure. This is within the control of the applicant and could be addressed through developer contributions. • It is not unusual for settlement boundaries to be extended to incorporate sites which otherwise have good potential. (11) |
| Selkirk | ASELK031 (Land North of Bannerfield) | Object to the exclusion of the site from the MIR. The following points must be considered: <ul style="list-style-type: none"> • The scale of the site could be extended or reduced. The owner would consider detached villa style development should that be deemed most appropriate. • The issues related to topography and infrastructure are not considered to be impossible and could add additional amenity and desirability to the site. (11) |
| Selkirk | ASELK032 (Philiphaugh Nursery) | Object to the exclusion of the site from the MIR. The following points must be considered: <ul style="list-style-type: none"> • The site has been incorrectly safeguarded as key green space within the LDP 2016. It is understandable the nearby sports fields, recreational areas, cricket field, rugby, football ground etc. would form part of this key greenspace, however the site in question is privately owned and could not be guaranteed to deliver the objectives of the key green space. • It is understood archaeological investigations would be required. • Confident, due to the extent of land ownership, that the current accesses could be amended and developed which may impact on the indicative capacity but would overcome the issue relating to visibility and horizontal alignment of the A708 in order to integrate with the existing street network. (11) |
| Selkirk | ASELK040 (Philiphaugh Mill) | SEPA continue to maintain that this site should not be included in the LDP2 for the same reasons as outlined in their previous responses: Due to the site being in a sparsely developed area and a proposed increase in sensitivity from commercial to residential SEPA do not consider that it meets with the requirements of Scottish Planning Policy and their position without prejudice is unlikely to change. SEPA have a shared duty with Scottish Ministers and other responsible authorities under the Flood Risk Management (Scotland) Act 2009 to reduce overall flood risk and promote sustainable flood risk management. The cornerstone of sustainable flood risk management is the avoidance of flood risk in the first instance. Therefore, SEPA recommend that this site is removed from the Local Development Plan. (119) |
| Selkirk | ASELK040 (Philiphaugh | Historic Environment Scotland (HES) note that this site is fully within Inventory Battlefield BTL14- Battle of Philiphaugh. HES are content with the principle of development here, subject to robust application of local |

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| | Mill) | and national policy. (164) |
| Selkirk | ASELK040 (Philiphaugh Mill) | Whilst the contributor thinks it is very important to identify sites in or around Selkirk – because many in the town would support growth in order to bring new vitality to the community, ASELK040 is at too much risk of flooding. The contributor recognises that considerable flood protection work has been done and that embankments surround this site these only protect against a forecast frequency of massive flooding – there is a significant residual risk and this site is the most southerly site that would be first impacted by over flooding of the Ettrick. This site should be deleted. (206) |
| Selkirk | ASELK040 (Philiphaugh Mill) | The Selkirk and District Community Council recognises the need for a robust masterplan for this neglected area of the town - with formal discussion with SEPA to resolve their concern re flood risk – especially after the successful completion of the extensive flood protection scheme (which SEPA was party to). Any master planning to identify and include environmental and infrastructural protection. (305) |
| Selkirk | ASELK041 (Philiphaugh 2) | The contributor suggests that this site should be allocated for the following reasons: <ul style="list-style-type: none"> • The site is located within the confines of the settlement boundary of Selkirk. • The site represents a natural “infill” housing opportunity and can take advantage of the recent and significant upgrade to the flood defences within Selkirk. • There is strong mainstream and affordable housing requirements within the town which are not currently being met by the relatively low level of allocated sites. • The site is located close to community facilities, cycle paths, public transport and Selkirk town centre. • It is a sustainable and deliverable site. • It is accepted that technical reports on matters such as flooding would be required at the application stage. • Given the site is “white land” within the current settlement boundary it is requested that the land is allocated for housing with an indicative capacity of c. 15 dwellings. (128 1of2) |
| Selkirk | ASELK043 (Land North of Selkirk Golf Club) | Contributor suggests an alternative site on land to the north of the Golf Club which is currently outwith the settlement boundary of Selkirk as defined by the LDP 2016. It is proposed for a residential development of 30 units. The contributor states the following: <ul style="list-style-type: none"> • There is a strong demand for good quality new housing in the Selkirk area. • There are no obvious constraints. • Water and electricity are available to the edge of the site. • The site has good road frontage to the A7 and A699. • Public transport is an important factor and the A7 trunk road is an important factor in terms of access to Hawick, Galashiels etc. (113) |
| Selkirk | General | The contributor believes that if the potential bypass route was properly surveyed, it would free up land presently sterilised by indecision over the planned route. (258) |
| Selkirk | General | With regard to Selkirk, new build housing take-up has been limited in recent years and this therefore argues against whether there is a justification for allocating further land for housing needs. |

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| | | <p>However, there has been recent development emphasis on extensions and the development of small brownfield sites or plots inserted into larger garden ground via change of use powers.</p> <p>There is also a continuing need for affordable housing – provided it is provided in a central location and convenient to transport/ shops/ services. Avoid discriminating against the needy! (305)</p> |
| Skirling | ASKIR002 Parkfoot | <p>The contributor seeks the allocation of this site for housing. They state that the Development Boundary for the settlement in the 2016 Local Development Plan has been drawn tightly thereby precluding new development from taking place. By not allowing opportunity to expand existing settlements like Skirling, the settlement will physically and socially become ossified with an increasingly ageing population, and with little if any scope for younger people to gain accommodation locally. Inclusion of this site would allow the settlement to grow in a sensitive manner, would not threaten the established character of the community, provide assurance to the community of potential physical and social change, as well as providing an opportunity which will enable a SME in the construction sector to develop their business locally. (156)</p> |
| Skirling | SBSKI001 Skirling Development Boundary Amendment | <p>The contributor seeks the inclusion of site SBSKI001 within the Skirling Development Boundary. They state that the area was previously included within the Tweeddale Village Plan 1997. In the contributors opinion the area should be reinstated as it forms a much shorter and more natural extension to the village boundary. (324)</p> |
| Smailholm | ASMAI002, Land at West Third | <p>The contributor has reviewed the surface water 1 in 200 year flood map which shows that there may be flooding issues in this area. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Consideration should be given to extending the sewer network into this part of the village to incorporate this and the existing houses in the west end as there is no nearby watercourse to receive a sewage discharge. There are a number of existing private sewage discharges to soakaway and hence any proposed new discharges to soakaway may impact groundwater. The contributor also advises that the site has a potential surface water hazard and water environment considerations. <i>Note: Contributor 119 has referred to this site as SBSMA001.</i> (119)</p> |
| Stichill | ASTIC003, Land North West of Eildon View | <p>The contributor objects to the exclusion of the site within the Main Issues Report. The contributor addresses the issues raised as part of the site assessment for ASTIC003.</p> <p>The contributor states that although there are no key services provided in Stichill the village is on the number 66 bus route to Earlston or Kelso. The contributor also states it would not be the first village within the Scottish Borders without services to see development. Although Stichill has no Primary School or Secondary School it will be within the catchment for those in Ednam and Kelso.</p> <p>The contributor states that it appears the main concern of development of this site is related to the site access. The contributor states the matter was address by additional information provided in August 2017</p> |

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| | | <p>which provided two alternative access routes. The contributor acknowledges the second alternative route is longer than desirable however it remains a viable alternative. The most suitable alternative access route is a short distance and could easily be provided as it is within the same ownership and could provide access for two-way traffic or alternatively a one-way system incorporating the exiting access under the to the former Stichill House. As detailed in the overall site assessment conclusion for 2018 these alternative accesses need to be assessed fully and the contributor requests the Council conduct an accompanied site inspection.</p> <p>The contributor states the site has significant interest from local developers. Although most developers would not consider 16 units to represent a relatively large scale development the contributor would consider reducing the capacity should the Council feel this would make a difference to the site's viability and sustainability. The contributor would like the Council to reconsider the site's status within the Main Issues Report. (13)</p> |
| Stow | ASTOW029 West of Crunzie Burn | <p>The contributor seeks the allocation of the site for housing with a potential capacity for up to 5 units. It is considered that there is demand at Stow for housing, and that development at this location would assist in the settlement maximising the benefit and use of the Borders Railway.</p> <p>It is considered that the site is well contained and offers a good opportunity for residential development. It is not considered that there are constraints associated with the site and no contamination issues. The site will not have a major impact on the road network and is highly accessible to Stow centre encouraging modes of transport other than the private car. The site is in a sustainable location and is in walking distance and will support the use of the Railway and local shops and services. The landowner now considers there to be two access points achievable to the site and which can be worked up in conjunction with the Council's Roads Department. The contributor has submitted an indicative site plan. The contributor also states that they stress the importance of allocating housing in the Scottish Borders where there is a strong demand to live. Due to the Borders Railway there is now strong demand to live in Stow. (118 (1 of 2))</p> |
| Stow | General | <p>The contributor considers that Stow must be a better priority for more housing due to the presence of the railway. (300)</p> |
| Tweedbank | MTWEE002 (Lowood) | <p>Section 5 of the MIR deals specifically with 'Planning for Housing' and references the need for the Council to maintain a five-year supply of effective housing at all times. It adds an important reference that "a site is only considered to be effective where it can be demonstrated that within five years it will be free of constraints and can be developed for housing". For the reasons set out and in the supporting report prepared by JLL it is considered that the Lowood site is not effective. Section 5.3 of the MIR references the LDP Examination of 2016 and the housing land shortfall of 916 units identified by the Reporter. With regard to the Tweedbank site, it is the largest proposed housing allocation at some 300 units making up some 37% of the overall housing land requirement addressed in the SG - it was intended to deliver 300</p> |

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| | | units within the current LDP period of 2016-21. Although the site is formally allocated within the LDP, and now forms part of the Council's established housing land supply, for the reasons set out in this response there are serious question marks over the effectiveness of the site. Notwithstanding the fact that the Council seems to have purchased the Lowood Estate on an unconditional basis, there is, it is considered, strong justification for removing the allocation and pursuing more deliverable and effective housing land opportunities that can represent the right development in the right place in line with the Council's overarching aims and objectives. Section 5.11 of the MIR sets out that "to ensure an adequate and effective housing land supply there is a requirement to ensure that there is a likelihood that sites allocated within the LDP will be developed. If any sites have been allocated within the LDP for a significant period of time with no development interest from either the land owner or the development industry then the site should be considered for removal". Section 5.12 refers to main issues and sets out that given the established housing land supply in the LDP and low completion rates, together with low housing land requirements within the proposed SESPlan, it is anticipated that the LDP2 is unlikely to require a significant number of new housing allocations. Nevertheless, the Council has proposed additional sites and has through the Call for Sites exercise a range of opportunities which it is considered present much more effective and environmentally acceptable housing land solutions than pursuing over-development at the highly sensitive Tweedbank site. (92) |
| Walkerburn | SBWALK001 Walkerburn Development Boundary Amendment and AWALK009 Caberston Avenue | The contributor seeks an extension to the Walkerburn Development Boundary as it represents a natural infill or 'rounding off' of the settlement. In addition they also seek the inclusion of site AWALK009 Caberston Avenue within LDP2. (303) |
| West Linton | AWEST019 North East of Robinsland Farm | The contributor seeks the inclusion of site AWEST019 within LDP2. This site would contribute to meeting the five year housing land requirement. There is currently only the former primary school site available for residential development for 10 units. The site AWEST019 is a logical and natural extension to West Linton. Without further land being identified, the Plan will fail to provide policy direction that will ensure housing demand at West Linton can be served. Access can be taken through the existing allocated Business and Industrial Estate – zEL18. This will assist in opening up the site and allow full servicing/infrastructure to be installed. It is noted that the contributor resubmitted information from the Call for Sites stage, that information states that the site would be developed for all affordable housing. (57) |
| West Linton | AWEST023 Medwyn Road | The contributor seeks the inclusion of site AWEST023 within LDP2 with a potential capacity of 6 – 8 units. It is considered that the site is suitable for low density housing. The site is well contained within a strong |

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| | West | mature landscape setting, and suitable vehicular access to the site can be taken directly from the north from Medwyn Road with additional pedestrian access provided from the golf course road to the west. This would provide an opportunity for access to wider walks to points of interest in the local area e.g. the golf course and dam. There is a centrally located group of trees within the site. These will be retained and will become a central design feature of any proposed development. The site would add to the range and choice of available housing in West Linton. It is proposed that a section of the site is retained as a paddock area. New housing would also help sustain the local community of West Linton and help extend services and facilities. It is considered that the site is an effective site that can come forward, and is sustainable and deliverable in line with Scottish Government policy and advice and will contribute to meeting the housing requirement for the wider Council area over the next five years. (106) |
| West Linton | AWEST024 Lintonbank | The contributor seeks the inclusion of site AWEST024 within LDP2 with an indicative capacity of 230 units. The contributor has prepared an indicative development framework for the site. Access to the site will be taken from a proposed roundabout on A702. The strong existing and proposed landscaping screens the site when approaching West Linton from the north. The single access from the A702 will mean there is no traffic directed to Main Street. Traffic from the site would have a net neutral effect on the existing road infrastructure. The site is well connected to West Linton along the Loan (Core Path 166), which will enable residents to walk to Edinburgh Road to the south. (311) |
| West Linton | General | Contributor 214 states that they are pleased to see there is no additional development identified for West Linton as the village currently has an ongoing development and is still adjusting to the addition of over 100 houses. In addition the contributor states that they are also pleased to read the comments in associated documentation that reinforces comments in the previous Plan that no further development will be permitted until there is an alternative route to the A701 without having to negotiate Main Street. (214) |
| West Linton | Housing | The contributor states that they do not agree that more houses should be built. West Linton is turning into a small town, not the conservation village so beloved of the developers trying to sell the houses. It is being hollowed out and turned into a commuter suburb where people sleep, but don't engage. The council seems intent on shoehorning in as many houses as possible. There appears to be no strategy other than extracting the maximum amount of cash in council tax from the inhabitants. (240) |
| Westruther | AWESR002, Edgar Road | The contributor recommends that the mature beech tree men is recorded in the Ancient Tree Inventory to help assess if this is an ancient or veteran specimen, and as such should be protected from adverse impacts of development. Again, the provision of protection 'where possible' may not be appropriate if the trees present on site are of importance. (199) |
| Westruther | AWESR002, Edgar Road | SEPA state that they require a FRA which assesses the risk from the small watercourse adjacent to the site. Site is relatively flat and hydrology would appear complicated at site. Consideration should be given to bridge and culvert structures which may exacerbate flood risk. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within this site. This should be investigated |

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| | | further and it is recommended that contact is made with the flood prevention officer. SEPA advise that there is a potential surface water hazard. Foul water must connect to the existing Scottish Water foul network. (119) |
| Westruther | AWESR002, Edgar Road | <p>The contributor raises the following concerns regarding the preferred option for housing in Westruther;</p> <ul style="list-style-type: none"> • Known issues with sewage and waste water in Westruther, regularly resulting in sewage rising in street drains; • Outwith the existing LDP development boundary for Westruther; • Disagree with the indicative capacity, 10 houses would not be in keeping with the setting; • Would be imperative that all hedging and trees are retained and their number enhanced to maintain the rural edge of the village; • Westruther is not in a rural growth area, has no public transport, has no shop and the Local Housing Strategy has not shown a local need; • There are other sites within the village with planning consent which have not been developed, therefore it would appear there is no requirement for more housing in the village; • Highlight reasons for refusal of planning application (07/01957/OUT), which they consider to be relevant to this site; • There has been no consultation by Eildon Housing Association with the village; and • The site is incapable of accommodating more than 6 houses. <p>The contributor further adds that they are concerned that the Council has been pressured by a housing association to include this field in the village boundary in order to meet Council, Government and Association targets at the expense of the community and future residents of any houses built. (138)</p> |
| Westruther | General | The contributor states that they are interested in the proposal for the village, but strongly believe that the views of the current residents should hold more sway than theirs. That said, they welcome any effort to bring sustainable business, and therefore employment, to rural areas, provided it does not unduly damage the environment and natural heritage. (152) |
| Planning for Housing: Question 7 | General | The contributor suggest old mills in Hawick are used and converted into flats or apartments. (296) |
| Planning for Housing: Question 7 | General | Network Rail (NR) do not wish to make comment on the generality of the preferred/alternative options for housing but wish the Council to take cognisance of the likelihood of new housing at settlements served by the Borders Railway to be significantly more sustainable than other sites within the area. Sites which allow residents to walk or cycle to stations should be prioritised. Notwithstanding existing allocations (noted at Tweedbank in particular), NR are disappointed that not more correlation with this principle exists with only one 'Alternative' proposal at Galashiels put forward (Netherbarns). (294) |

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| Planning for Housing: Question 7 | General | Peebles Civic Society note that the MIR does not mention in the Eildon Locality any longer term housing developments in comparison to Tweeddale. (30) |
| Planning for Housing: Question 7 | Affordable housing | The contributor states that there must not be a minimum amount of social housing, there must be a reasonable amount. (203) |
| Planning for Housing: Question 7 | Affordable housing | The contributor agrees and states that we need to encourage young people to live and settle in the Scottish Borders so we need to provide affordable but excellent quality housing to buy and to rent. (301) |
| Planning for Housing: Question 7 | Allocations | <p>The contributor would support a range of sizes and locations of sites being allocated within the emerging LDP to support different scales of house builders from small scale home builders, to larger home builders. This would allow a range and choice for delivery of new homes. Over reliance on smaller sites will not allow meaningful and sustained housing growth within the Borders to be achieved.</p> <p>They do not support the consultation on preferred and alternative allocations within the MIR at this stage in the absence of an approved SDP and clarity on the number of new homes required and question the accuracy on all levels of the housing numbers provided with both the MIR and the Technical Note. (306)</p> |
| Planning for Housing: Question 7 | Alternative locations for development | The contributor suggests alternative locations for development; Galashiels, Hawick, Peniculk and West Linton. (227) |
| Planning for Housing: Question 7 | Ancient trees and woodland | The contributor states that their main concern is the impact on the ancient woodland and ancient and veteran trees. They cannot agree with many of the instances where it is required that boundary features should be retained 'where possible' because in some instances they have identified ancient woodland, and also there could be ancient or veteran trees present around the site boundary, such features are irreplaceable and should be protected from adverse impacts of development. Scottish Planning Policy (SPP) states that ancient woodland and trees should be protected. They suggest that the wording 'where possible' is replaced with 'where appropriate'. In instances where ancient woodland, and/or veteran or ancient trees have been identified these features must be retained and protected from adverse impacts of development. In all instances where additional planting is required, the contributor would like to see planting with native tree species, appropriate to the site conditions, and sources and grown in the UK. (199) |
| Planning for Housing: Question 7 | Approach to identification of housing | The contributor disagrees with the approach which has been taken in the MIR to the identification of sites. States that based on the SESplan figures, very little need is identified and Scottish Borders has a massive figure of 8,586 units identified within LDP's, of which 3,469 units are 'effective'. Queries the following; |

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| | | <ul style="list-style-type: none"> • Why is the effective figure so low at 40% of the total and what actions are you taking to increase that percentage; • When you have nearly 10 years effective housing land supply and need only 5+, why are SBC looking for more sites; • The current over supply is more than enough to accommodate the problems of getting sites available in the right places in a rural area. <p>The contributor raises the following issues with the proposed policy;</p> <ul style="list-style-type: none"> • Such a massive over supply of sites, over the requirement risks development taking place in locations that are not the 1st preference of the Council; • Why are the Council identifying so many potential new sites? • The real focus should be on the needs which are now chronic underinvestment in the services and infrastructure to meet the existing housing and those sites. Schools, roads, medical facilities are the top priorities, not more housing. (206) |
| Planning for Housing: Question 7 | Areas for future housing | <p>The contributor states that housing allocations should be in the following areas:</p> <ul style="list-style-type: none"> • With the best communications such as Tweedbank; • With the highest levels of deprivation and housing need; • In new towns allocated near the new Border Railway, with good road access to the main border towns and • As satellites to existing towns such as occurred with Cardrona next to Peebles. (25) |
| Planning for Housing: Question 7 | Areas for self-building | The contributor recommends setting aside a number of small areas of land around the Borders within identified sites for self-building. (96) |
| Planning for Housing: Question 7 | Brownfield sites | The contributors do not agree there should be any large scale developments out with the town boundaries. The contributors would not object to brown field sites being developed within the town along with industrial premises if possible. (257) |
| Planning for Housing: Question 7 | Distribution of housing | The contributor states that SESplan Proposed Plan HLR is 3,841 houses for the Scottish Borders. Equity and fairness suggests that these should be spread across the terrain to enable the additional housing to boost all areas. Concentration of eg 10% of the total in Eshiels, plus the allocation to Peebles, Cardrona etc deprives other areas, whilst putting strain on the infrastructure, attractiveness and amenities of Peebles and environs. (197) |
| Planning for Housing: Question 7 | Distribution of housing | The contributor questions why 30% of the proposed preferred/proposed housing units required in this plan in the Peebles/Eshiels area when the geographical span of the Scottish Borders is so great. The contributor states that there are other areas of the Borders which still require investment and regeneration (including brownfield sites), this includes Walkerburn, Galashiels and Hawick. (276) |

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| <p>Planning for Housing: Question 7</p> | <p>Distribution of housing</p> | <p>The contributor states that the citizens of Galashiels, Selkirk, Kelso and Eyemouth etc, will be dismayed that the Council have ignored the chance of developing their towns in a sensitive, sustainable manner. (155)</p> |
| <p>Planning for Housing: Question 7</p> | <p>Effectiveness of sites in the Housing Land Audit</p> | <p>The contributor states that based on the effective housing land supply within the 2017 HLA, it is suggested that each year there will be significant over supply. The contributor has provided a table showing this over supply for 2018-2024.</p> <p>The contributor highlights that many of the site within the HLA are owned by private land owners and whilst technically they have the ability to release these for development if there is no demand for these sites within with the owners consider an appropriate return then the sites will be unlikely to come forward. Rolling forward historic sites that have been in the audit for an extend period does not ensure that housing land requirements are met as the sites are clearly unviable, undeliverable or unmarketable. They note that 6 of the 7 sites added in the previous 5 years have delivered new homes. They state that this shows that when new sites come available with clear developer interest from the outset then the rate of deliver if considerably greater than those which have been in the supply for longer.</p> <p><u>Berwickshire HMA</u></p> <p>The contributor sets out findings and conclusions from the HLA in respect of the HMA's. The contributor raises the following concerns;</p> <ul style="list-style-type: none"> • A large number of sites have been in the HLA 10 years or more; • The majority of sites within the Berwickshire HMA, pre-date the recession and whilst not listed as being 'constrained' due to their age and persistent failure to deliver, are clearly unviable options for developers; • Sites owned by private individuals reduces the possibility of sites being developed quickly after planning permission is granted and thus reducing the actual effective land supply of the site over the plan period; • Of the 9 sites added within the Berwickshire HMA in the last 5 years, only 4 sites have both planning permission and a registered house builder; • The remainder of the site within the Southern HMA do not have a developer and do not appear to have a pending or approved planning application, this reduces their chance of becoming truly effective over the planner period; • Of the 11 sites added within the Northern HMA in the last 5 years, 5 of those sites do not have developers associated with them and 3 of the sites do not have any form of planning permission or pending application. The 5 sites currently with no developers associated with them, represent 220 |

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| | | <p>units of 'effective' supply over the 5 year plan period, however without approved planning permission or a developer aligned it is highly unlikely these will be developed in the next 5 years, clearly reducing the supply in the Northern HMA;</p> <ul style="list-style-type: none"> • Within the Central HMA, half of all the sites within the HLA significantly predate the recession and as the Central market area is the populated and desirable area within the Borders, the only reason for these sites to have not come forward is due to the fact they are not effective, either through marketability, viability and/or are constrained in some other manner; • Within the Central HMA, 11 sites have been added to the HMA within the last 5 years. However the contributor questions the deliverability of these sites given the lack of developer interest or planning consent and highlights the ineffective nature of older sites in the audit and that the supply of truly effective housing sites is significantly lower than that states in the HLA. <p>The contributor raises concerns that there is an over reliance on a historical and ineffective housing land supply to meet the Council's housing land requirements. They do not provide a range and choice of viable land for housing in locations where the market wants to deliver, and most importantly do not provide development opportunities for Galashiels. (129)</p> |
| Planning for Housing: Question 7 | General | The contributor states that the Council seem to be fixated on shoehorning houses into any space in the face of local opposition. There appears to be no strategy other than extracting the maximum amount of cash in council tax from the inhabitants. (240) |
| Planning for Housing: Question 7 | General | The contributor states that there should be no change to the existing plans. (288) |
| Planning for Housing: Question 7 | General | <p>The contributor states that without changes to some allocation boundaries, selection of alternatives and the delivery of development frameworks and briefs, it may be difficult to achieve the place-making and natural heritage objectives set out in the MIR. In this regard, they strongly recommend that the Proposed Plan should adopt a clear format to address these matters and to demonstrate how it will address the policy principles for the planning system as set out within SPP.</p> <p>Given the brevity of the site requirements provided in the MIR, we suggest that one role for the Proposed Plan will be to clearly set out what will be required of developers to ensure that their proposals secure and build on the assets of their locations. This could be achieved by including site development briefs for each of the allocations. (213)</p> |
| Planning for Housing: Question 7 | General | <p>The contributor states that there are other towns such as Hawick, Kelso, Selkirk and Eyemouth that also require foresight, to help them develop and become more sustainable in the years ahead. (185)</p> <p>The contributor questions why there is not more emphasis on housing development in Galashiels and the</p> |

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| | | route along the Borders Railway? (283) |
| Planning for Housing: Question 7 | General | The contributor feels that any new housing developments should be future-proofed for the environment e.g. all new houses should have solar PV panels etc. (255) |
| Planning for Housing: Question 7 | Historical completions | The contributor outlines the previous completion rate within each of the HMA's. The state that it is evident that despite the HLA identifying multiple sites across each HLA as effective, the annual output from these sites is very limited. This is symptomatic of an aged supply with concealed constraints. What is notable, is that of those sites added to the HLA within the past 5 years, 6 or 7 have delivered new homes since their addition. (129) |
| Planning for Housing: Question 7 | Housing land provision within smaller settlements | The contributor states that the approach within the MIR is to identify and plan for large scale housing releases in particular centres. As a result many small communities will be physically and socially ossified with an increasingly ageing population. The identification of small sites within each of the Border communities, would allow each village and hamlet to continue to grow, creating opportunities for small locally-based builders and contributing to meeting housing needs not addressed by the national builders. (156, 264) |
| Planning for Housing: Question 7 | Housing land supply | The contributor states that the MIR is contradictory on the requirements for housing land, as stated in the preceding paragraph, the LDP2 must incorporate a generous supply of housing land. Paragraph 5.12 of the MIR states, 'Given the established housing land supply in the LDP, low completion rates and low housing land requirement within the proposed SESplan, it is anticipated that the LDP2 is unlikely to require a significant number of new housing allocations'. (318) |
| Planning for Housing: Question 7 | Housing land supply | The contributor states that the Scottish Borders would appear to be in the fortunate position of having a generous supply of housing land following the approval of the Housing SG. Any changes to the SESplan could affect the situation and acknowledges that it may be some time before house completion rates in the Borders pick up. (7) |
| Planning for Housing: Question 7 | Housing land supply | The contributor states that their client fully supports the efforts to identify a generous supply of land for housing, in line with SPP, and to maintain a 5 year effective housing land supply at all times. They acknowledge that in order to ensure an adequate and effective housing land supply, there is a requirement by SBC to test the likelihood that sites allocated within the LDP will be developed. In this regard, their client supports SBC efforts to remove sites which have been allocated for a significant period, but which have no development interest from either the land owner or development industry. (10) |
| Planning for Housing: Question 7 | Housing land supply | The contributor objects to the suggested strategy that the LDP2 will not require a significant number of new housing sites, given an established housing land supply, low completion rates and low housing land requirement. The contributor agrees with Homes for Scotland's position that the SESplan 2 housing supply tables should be amended to resolve arithmetical errors in the Reporter's findings for the |

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| | | Examination (relating to the HNDA backlog). They therefore contend that the proposed LDP2 MIR housing strategy is flawed, given the potential risk to delivery. The contributor recommends that SBC look to identify further housing sites on effective land, in locations where developers have identified as a place where people want to live and where they wish to build. (114) |
| Planning for Housing: Question 7 | Housing land supply | The contributor notes that Table 3 'Housing Land Requirement' is contrary to Scottish Planning Policy as well as the Report of Examination for SESplan 2. The period for the housing land requirement is from 2011/12 to 2029/30. The MIR therefore is not able to determine whether or not all the preferred and alternative options will be sufficient to meet the housing land requirement in full. Until SESplan 2 is approved by Ministers, the LDP2 cannot determine whether a significant number of new housing sites are required or not. (311) |
| Planning for Housing: Question 7 | Housing land supply | <p>The contributor states that there is a requirement for the LDP2 Proposed Plan to use the most recent housing dataset that emanates from the SESplan 2 Examination/Adoption. The contributor sets out their own table/figures for the Scottish Borders housing land requirement throughout the submission, including constrained/non effective sites.</p> <p>The contributor refers to the housing land requirement set out within the Scottish Borders Supplementary Guidance on Housing and which was based on the SESplan Supplementary Guidance (SSG). They state that one requires to look back and understand if the housing land requirement has been achieved and if not what actions are going to be taken to rectify the shortfall.</p> <p>The contributor makes reference to the Reporter's decision in the recent SESplan 2 Examination, regarding maintaining a five year effective housing land supply at all times and fully accounting for any deficit or surplus in completions against the housing supply target in previous years. The contributor raises concerns regarding an effective land supply within Scottish Borders. They raise concerns regarding an effective housing land supply and previous average annual completions rates.</p> <p>The contributor queries the table 4 contained within the MIR and requires clarity regarding how sites are considered 'potentially effective and post year 7' within the annual HLA.</p> <p>The contributor raises two general conclusions:</p> <ul style="list-style-type: none"> • There is not considered to be a five year effective land supply and • There is 'root and braches' review required of the site deemed to be 'effective' prior to the proposed LDP2 consultation. It would appear that the sites allocated within the current LDP are not entirely 'effective' and will not meet the five year supply targets in full as sought by SPP and SESplan. <p>The main points raised in the submission are outlined below;</p> |

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| | | <p>The contributor states that in short there are arguably a further 1,500 to 3,000 new allocations required in order to meet set targets given the constraints of existing allocated sites. An over reliance on windfall sites should not be advocated by the LDP2 but more modest and deliverable sites added to the housing supply.</p> <p>They state that there should be an increase in the housing land requirement to compensate for the identified shortfall. Over identifying land in locations where there is not significant housing demand is counterproductive and only going to lead to housing targets not being met and pent up demand in areas where developers and people wish to live.</p> <p>The contributor lists sites identified within the LDP but which they consider likely to be constrained in whole or part. This, the need to consider additional opportunities that are likely to be more deliverable within a shorter time frame. They also list sites, which they request are reviewed in greater detail in relation to their general location acceptability and overall deliverability in the short to medium term.</p> <p>The contributor states that there are land allocations totalling a significant number of homes, that they question in terms of being fully deliverable as part of any five year effective land supply or during the lifespan of the current LDP.</p> <p>The contributor lists sites which they request to be reviewed in greater detail in relation to their general location acceptability and overall deliverability in the short to medium term. (117,128,130,131)</p> |
| Planning for Housing: Question 7 | Housing land supply | The contributor refers to section 1.7 of the MIR and 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. The contributor questions how this number relates to the number of 3,841 houses references in section 1.d of their response and why does Peebles have to take such a high share of the housing requirement. (73) |
| Planning for Housing: Question 7 | Housing land supply | The contributor highlights that there is uncertainty over the SDP plan period, there is also significant uncertainty over the HST and HLR in the absence of an approved SDP. There is still a significant difference in the number of homes required by the HLR in the Reporter's recommendations, compared with the Proposed Plan. Therefore, without the clarity of an approved SDP, which HLR should be taken into consideration by the LDP, and over what period should we consider this? (306) |
| Planning for Housing: Question 7 | Housing land supply and delivery | The contributor has produced their own report (Appendix 1.1-1.5 within their submission), in respect of housing land supply/delivery/effectiveness of sites within the Scottish Borders. The contributor has also undertaken a review of sites within Peebles (Appendix 2 within their submission). The contributor raises concerns that the housing figures in SBC are flawed and will not deliver the targets set out by SESplan 2. |

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| | <p>These concerns are outlined below.</p> <p><u>Housing Land Supply</u> The contributor raises concerns regarding the rate of completions within the Scottish Borders, over the last five years. At the current rate of completions, the housing supply target would not be achieved and would provide a shortfall of 50 units per annum.</p> <p><u>Effective Land Supply</u> The contributor raises the following concerns regarding the effective land supply within the Scottish Borders;</p> <ul style="list-style-type: none"> • Allowance for windfall sites should be excluded from the consideration of effective land supply; • Land currently identified in the HLA as constrained should not be considered to contribute towards the effective housing land supply, as at this point in time it is not expected to become effective; • The land supply is based on an assumption that all sites will be completed within the period, rather than considering the programme of larger allocations and the likely contribution towards the effective 5 year land supply; • SG sites are not all in addition to the effective land supply and there has not been a review of the effectiveness of these sites undertaken; • There is an estimate of completions for the 4 years up to the predicted date of adoption, which would represent an undersupply of 146 units. <p>The contributor sets out their own assessment of the existing and proposed land allocations and an application of programming for these to determine the effective land supply for the next plan period. They conclude that the allocations, do not provide sufficient effective land, to meet the housing delivery targets up to 2030/31.</p> <p><u>Windfall Sites</u> SBC have applied a fairly consistent figure of windfall to its projections, however, the inclusion of these sites in the figures in calculating the effective housing land supply is not in accordance with PAN 2/2010.</p> <p><u>Contribution of Small Sites</u> The contributor states that the method of calculating the completions on small sites within the SBC HLA in Appendix 3 is unclear. Based on this, there should not be any additional consideration to small sites in identifying the established land supply.</p> |
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| | | <p><u>Review of Existing Land Supply</u> The contributor has undertaken a review of the deliverability of the allocations within the other settlements, but it should be noted that of this supply there are allocations that have been in the audit in excess of 10 years with no progress towards delivery. This results in a loss of 395 units from the effective housing land supply within SBC.</p> <p>The contributor has undertaken a review of the existing sites within Peebles (Appendix 1 within their submission), outlining whether the sites are considered to be effective or not.</p> <p><u>Assessment of Overall Housing Supply Target</u> The contributor has assessed the overall housing supply target, utilising the existing programming for the settlements within the Strategic Growth locations with amendments made to this in accordance with the review of SG sites, new allocations and the existing effective land supply. The findings indicate that the land available and proposed within the Strategic Growth locations will provide a shortfall of 620 units. They advise that SBC undertake an extensive review of allocated land to determine effectiveness and where appropriate remove allocations to direct resources and investments to locations that can meet the housing need and demand.</p> <p><u>Greenfield Allocations</u> Raise concerns that not enough greenfield land is being allocated within Scottish Borders. They state that the Borders has an over reliance on brownfield sites which are, in many cases, not effective or in locations where there is not an established demand.</p> <p><u>Shortfall in level of housing within Peebles</u> The contributor has reviewed the allocations in Peebles between 2019 and 2031, detailed in Appendix 2, and the report suggests that across this period there will be a shortfall in the required level of housing, which will subsequently impact on the City Region. Given past trends of below target housing completions, reducing the supply in the Northern area will severely compromise delivery and it is considered that there should be a greater focus on development in Peebles to meet housing targets.</p> <p><u>Rate of Delivery</u> The contributor raised concerns at the forecast rate of delivery between 2024 and 2029, which stands out at having low completion rates, within Peebles. This is contained within the report produced by the contributor within their submission. (127)</p> |
| Planning for Housing: | Housing policies | The contributor states that they would be supportive of the inclusion of policies to support the delivery of homes. Given the nature of the Scottish Borders, we recognise that there are opportunities for small scale |

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| Question 7 | | home builders to operate and flourish in the region, and we would like to see the inclusion of policies to support these small scale home builders in particular, to help to strengthen and encourage this sector of the market, as well as overarching policies supporting the delivery of homes more generally. (306) |
| Planning for Housing: Question 7 | Housing Technical Note | <p>The contributor queries a number of the assumptions made within the Housing Technical Note. They request that the Council provides a far more detailed Housing Technical Note to explain in a robust and transparent way, how all of the assumptions within the 'Planning for Housing' chapter of the MIR have been reached, to allow all parties to be able to analyse these, and comment on their appropriateness.</p> <p>Established Housing Land Supply: Query the inclusion of all post year 7 land supply and the assumption that this will all contribute towards the requirement to 2030/31 without clarification that all of these homes are able to be delivered by 2030/31. It may be that within Scottish Borders without any major strategic land releases, all of these homes are capable of being delivered by 2031, but this is not clear from the Technical Note.</p> <p>Query the inclusion of the constrained units within the supply, as capable of contributing towards the HLR to 2031. There is no explanation within the Technical Note for this, but it suggests that the assumption has been made that all currently constrained sites can be expected to become effective within the LDP plan period. No evidence is provided to explain how this assumption has been reached, and how the current constraints will be overcome to allow these homes to come forward into the effective housing land supply and be delivered.</p> <p>Windfall Assumptions: There is no evidence base or explanatory text provided to explain how these windfall assumptions have been reached and what they are based on.</p> <p>Demolition Assumption: No explanation is given for this assumption, so it is not clear why the assumption has been set at this level, nor is it possible to scrutinise this level to determine whether or not it is reasonable.</p> <p>Estimated completions: No explanation has been provided to justify this assumption therefore it is not possible to understand why the authority has taken this approach to estimating completions for the period. This is particularly confusing since the Technical Note uses the effective supply from the latest audit in Tables 4 and 5 as the programmed completions which will contribute towards the housing requirement. The estimated completions in Table 8 are some 338 homes less than the programmed completions in the 2017 audit for the same time period. If the Council believes that the estimated completions in Table 8 are more realistic than those programmed in the audit because the audit contains over inflated programmed completions in some years which are unlikely to actually be delivered, then it</p> |

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| | | <p>should not be using the programmed completions from the audit to inform tables 4 and 5, and should instead set out a robust and transparent justification for using this alternative completions assumption in Table 8 instead. It cannot be the case that two tables use one assumption (Tables 4 and 5) whilst Table 8 uses a different assumption. Further clarity and evidence are required to be able to scrutinise the number of homes the Council believes will be completed between 2017/18 and 2020/21.</p> <p>Contributions to the Requirement: The issue of an inconsistent approach to the methodology for estimating completions results in Table 10 of the Housing Technical Note being flawed. This table sets out total contributions to the housing requirement from 2017/18 – 2030/31 therefore is a key piece of the Council’s evidence to support the LDP. Amongst other contributions, this table includes a potential land supply figure from the 2017 housing land audit (as set out in Table 4) and then subtracts an estimate of completions from 2017/18 to 2020/21 (as set out in Table 8). Because these two figures are based on different instead of matching assumptions, it means that more homes are estimated as contributing towards the requirement than will be subtracted in the assumption on completions for the same time period. This methodology is not explained anywhere in the Technical Note and is flawed. Given the importance of this table to the decision on the number of homes that are required to be allocated for the emerging LDP, it must be based on a robust methodology. Instead, the table is based on un-evidenced assumptions of windfall and demolitions from 2017/18 to 2030/31 as well as a flawed methodology for the assumption on the number of homes that will contribute towards the requirement from 2017/18 to 2020/21 and the number of estimated completions within this same timeframe. HFS believes table 10 should be reduced by at least 338 units, and potentially more pending the ability to scrutinise a more transparent evidence base. (306)</p> |
| Planning for Housing: Question 7 | Inclusion of longer term sites | The contributor notes that, the MIR states that whilst a ‘significant number’ is not defined the proposals include the use of longer term sites. They question why longer term sites should be included given that a ‘significant number’ is not anticipated. (277) |
| Planning for Housing: Question 7 | Infrastructure | <p>Contributor 247 states the lack of infrastructure is crucial.</p> <p>Contributor 251 states that we do not want or need this number of extra homes and the sites identified are totally inappropriate. We do not have the schools, medical facilities or infrastructure to support even a fraction of these developments.</p> <p>Contributor 276 asks when is a town deemed overdeveloped in relation to its infrastructure. (247, 251, 276)</p> |
| Planning for Housing: Question 7 | Local and National house builders – | The contributor states that small local housebuilders depend on completions and house sales to remain profitable, national housebuilders are more concerned to maximise returns than to increase output as an end in itself. National housebuilders may use land banks to control the flow of new housing into local |

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| | housing delivery | <p>markets, and to strengthen their negotiating position with landowners. They raise concerns that there are a number of barriers for small builders in house building. In recent years, there has been a large number of small local builders dissolve. Whilst at the same time, national housebuilders have been largely monopolising house building and land banking within the Scottish Borders. (156, 264)</p> <p>The contributor submitted a background document, highlighting the above, as part of their submission (NHBC: Small house builders and developers). (156)</p> |
| Planning for Housing: Question 7 | Location for future housing | The contributor states that housing should be adjacent to existing towns/villages and not spread all over the countryside. (204) |
| Planning for Housing: Question 7 | Location of housing | The contributor states that housing should be adjacent to towns/villages and not spread all over the countryside. (204) |
| Planning for Housing: Question 7 | New town | The contributor states that in respect of 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). (73) |
| Planning for Housing: Question 7 | Presentation of housing land numbers, MIR content, and Borders Railway | <p>The contributor states that they are disappointed at how housing sites and mixed use sites were shown separately within the MIR. The document did not make it obvious that mixed use sites would also contain housing.</p> <p>In addition the document places a lot of emphasis on the provision of housing but land for expanded public services following the provision of more housing does not seem to be addressed, such as for education or healthcare. When the issue is finally addressed all suitable land will only be available for sale at inflated housing land prices. In general there are reference to encouraging / promoting things which are done by others but less reference to important public services such as education and healthcare.</p> <p>The Borders Railway may well be successful, but it and its potential extension to Carlisle does little for transportation to anyone living in or around Peebles. (96)</p> |
| Planning for Housing: Question 7 | Railway Corridor – Edinburgh to | 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 |

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| | Galashiels | 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). (73) |
| Planning for Housing: Question 7 | Retirement village | The contributor raises concerns that there is a lack of policy on planning how to deal with, and benefit from, the predicted shift in the age demographics of the Scottish Borders. The contributor highlights that there is an opportunity to develop an economic growth boom for an area by the establishment of a retirement village. Any such village needs to provide and promote the availability of recreation and social facilities within a highly attractive development for living in. (90) |
| Planning for Housing: Question 7 | Sheltered housing | The contributor states that specific plans within LDP2 (eg) the provision for sheltered accommodation for the elderly are just not there, clearly a huge need given the demographics and figures stated in the document or are the over 65's. This might then free up some housing stock to bring in younger householders and families which would contribute to increased vibrancy, economic footfall across the demographic range and assist the viability of town centres. (197) |
| Planning for Housing: Question 7 | Small scale developments | The contributor states that more small scale developments should be allowed in the countryside, up to a maximum of ten units per site. (222) |
| Planning for Housing: Question 7 | Split of housing units within a mixed use site sites | The contributor states that it is very difficult to comment on proposals for 'mixed use' land as there is no indication as to what the split between industrial/housing would be. They assume that the unit figures in the MIR for the 'Mixed use' apply to the housing element as there are no unit figures given for the single use Business/Industrial/ land use sites. (90) |
| Planning for Housing: Question 7 | Tenure of Housing | The contributor questions whether there is a mis-match between the types of houses needed in the Borders (smaller, affordable units) and the types of housing being built (larger family homes). If so, what steps can be taken to incentivise more of the former, perhaps by reducing developer contributions. Rural communities will need to have housing such that those on local wages can afford to live there. Communities could be helped to develop such housing themselves so that it is both locally owned and managed. (196) |
| Planning for Housing: Question 7 | Windfall Sites | The contributor raises concerns about the addition of the 'windfall' sites after the creation of the 2016 LDP. The 'windfall' sites should only be limited to sites of 20 houses, otherwise the LDP is distorted. They make reference to the following sites in Peebles; Peebles Hydro (31 units), Kingsmeadow House (12 units), Kingsmeadow House II (10 units) and March Street Mills (69 units). They also make reference to the planning application (17/00606/PPP) at Kittlegairy. Thus, the total number of 'windfall' sites amounts to 338 units, bearing in mind that the current LDP plans to build only 225 houses. (30) |

QUESTION 8

Do you agree with the preferred option for addressing proposals for housing in the countryside? Do you agree with the alternative proposal? Have you any other options which you feel would be appropriate?

QUESTION 8

Do you agree with the preferred option for addressing proposals for housing in the countryside? Do you agree with the alternative proposal? Have you any other options which you feel would be appropriate?

| Main Issue | Sub Issue | Summary of Main Issues Raised |
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| Planning for Housing: Question 8 | Agree with preferred option | The contributor supports the preferred option for housing in the countryside policy. (60, 169, 171, 216, 230, 262, 263, 312) |
| Planning for Housing: Question 8 | Agree with preferred option | The contributor recommends that the existing (grouping) policy is maintained and that one-off buildings (i.e) isolated and apparent ad-hoc development set in the middle of the rural environment, which adversely affects the context and scale of the local (rural) environment – should be firmly rejected. (305) |
| Planning for Housing: Question 8 | Agree with preferred option | The contributor agrees with the preferred option. They state that the policy should be more strictly applied, it is well known that it is easy to get round it by claiming economic necessity, for example. This should be more closely scrutinised. (274) |
| Planning for Housing: Question 8 | Agree with preferred option | SEPA agree with the preferred option for addressing proposals for housing in the countryside. (119) |
| Planning for Housing: Question 8 | Agree with preferred option | The contributor agrees with the preferred option of retaining the current policies for housing in the countryside. We need to avoid a plethora of individual houses dotted on every corner. There are problems of services (not just water, electricity, broadband, waste, but care of the elderly and infirm) and of despoiling of the landscape. (206) |
| Planning for Housing: Question 8 | Agree with preferred option | The contributor agrees with the preferred option. The contributor disagrees with the alternative option and feels that the development of ad-hoc individual houses does not foster the development of a community environment, does not significantly help with any perceived housing shortfall and generally would be 'development' type properties suitable to the ageing population profile identified in Table 2 and/or affordable properties or starter homes required to encourage younger generations to stay in the Borders. (289) |
| Planning for Housing: Question 8 | Agree with alternative option | The contributor supports the alternative option for housing in the countryside policy. States that a carefully chosen set of criteria must apply. There are always sites outwith existing settlements where appropriately designed and scaled housing developments make perfect sense. The site must have accessibility, achieve outstanding sustainability standards and exceptional design standards. They must avoid urban characteristics such as large areas of tarmac, prominent kerbs, road markings, signage and street lighting. (24) |
| Planning for Housing: | Agree with alternative | The contributor states that they would be supportive of the alternative option for housing in the countryside policy, in this or a subsequent Local Plan, if more detailed reassurances about setting, design and |

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| Question 8 | option | materials are specified. The stand-alone option would clearly encourage higher standards of innovative design than are likely at present when adding to, complementing and blending with, existing groups. (60) |
| Planning for Housing: Question 8 | Agree with alternative option | <p>The contributor states that there is a place for good development across a range of locations across the Borders, including those in the countryside. They believe that the alternative proposal, to allow some development in the countryside on the proviso that it can be justified by good design and acceptable impact on the surrounding area (visual/infrastructure etc) should be supported.</p> <p>There are numerous redundant or semi redundant former cottages and farm buildings in the countryside that could be brought back into beneficial use. However, the cost of refurbishment/redevelopment coupled with limited financial returns means land and property owners cannot justify the outlay. Appropriate new build in addition to the existing property would help bridge this funding gap. Many of these buildings are constrained by access difficulties or lack of modern services. In such cases relocating a house to a more accessible site could offer the council a realistic building with a better located and more sustainably constructed alternative.</p> <p>More flexibility is needed for development in the countryside to assist with diversification opportunities for rural businesses and to promote sustainable development.</p> <p>Modern living promotes less travel, working flexibly and from home whilst landowners are needing to diversify to ensure a viable existence in the countryside.</p> <p>There is potential for well-designed innovative development in the countryside (not just residential) and future investment in appropriate development should be encouraged in promoting good practice and also in supporting the rural and wide Scottish Borders economy.</p> <p>An innovative yet practical approach to the reuse of the existing stock of under-utilised property in desperate need of refurbishment and redevelopment coupled with pockets of complimentary and enabling new development can go some way to providing new and affordable housing whilst making the most of the resources already available. This could also involve the permitting of new development at better locations where current conditions preclude the redevelopment of isolated or poorly served existing properties. (101)</p> |
| Planning for Housing: Question 8 | Agree with alternative option | <p>The contributor supports the alternative option where individual houses could be constructed outwith building groups, provided it is considering the design of an exceptionally high standard and other policy requirements relating to appropriate setting, design and materials are satisfied. (195)</p> <p>Availability of housing is crucial to the economy of the Scottish Borders. The ability of the rural economy to diversify will be crucial, especially as Brexit unfolds. Part of enabling this diversification will depend on the availability of housing in the countryside to accommodate employees of growing businesses. Using the</p> |

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| | | example of increased tree planting mentioned within the MIR, workers will be needed to manage new plantations and they will need houses, preferably within easy commuting distance to their work. It is their view that the alternative option allows for an appropriate level of flexibility that can help stimulate diversification and sustainably drive the economy of the Scottish Borders, helping rural communities thrive. (195) |
| Planning for Housing: Question 8 | Agree with alternative option | The contributor supports the alternative proposal. Many businesses report the requirement to demonstrate an economic requirement for an individual new-build as a barrier to planning and feel the need for this should be removed. (165) |
| Planning for Housing: Question 8 | Agree with alternative option | <p>The contributor supports the alternative proposal with regards to a stand-alone housing in the countryside. They consider that the ability to pursue development in the countryside and the ability to build new dwellings in rural Scottish Borders is essential for the future viability of rural communities and rural enterprises. The submission includes a number of reasons for supporting the alternative proposal, which include;</p> <p><u>Economic potential for rural areas</u></p> <ul style="list-style-type: none"> • Greater scope for prospective builders • More favourable than conversion/restoration • The existing design principles within the LDP and SPG paired with pragmatic policies would have the ability to control the provision of stand-alone housing • Encourage more people to relocate to the countryside • Allows innovative and interesting housing to be brought to the Scottish Borders • Allow housing targets to be met more easily • Economic benefits to rural communities • The alternative approach is in support of the Government’s aspirations as it allows more rural development opportunities, whilst keeping in line with design and placemaking guidelines <p><u>Avoidance of urban centric policies</u></p> <ul style="list-style-type: none"> • This alternative approach prevents urban-centric thinking and contributed to the long-term ambition that rural economic policy is mainstream with the national economic policy. <p><u>Sustainable travel</u></p> <ul style="list-style-type: none"> • Potential to cut down on travel distances and excessive use of private cars • Allow people to build homes closer to their workplace which may cut car travel times • Provides rural homes for people employed locally and therefore not commuting significant distances • Allowing stand-alone housing embedded into the landscape makes an attractive place to work |

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| | | <p>(home work)</p> <ul style="list-style-type: none"> • Allowing stand-alone housing provides more opportunities for families to enjoy the countryside and for people to have a better work-life balance which are attractive characteristics which will continue to attract people to rural areas <p><u>Rural de-population</u></p> <ul style="list-style-type: none"> • With rural population declining, it is important that new policies are implemented to increase the interest in relocating to the countryside. This alternative proposal is attractive in that there will be more locations where people can build if their development is to a high quality • Bringing high quality design houses to the countryside makes rural areas more eye catching and interesting, and places where people would like to live. <p>The contributor notes that cumulative build-up of single houses in certain areas should be avoided. (132)</p> |
| Planning for Housing: Question 8 | Agree with alternative option | The contributor supports the alternative approach. (96, 276) |
| Planning for Housing: Question 8 | Agree with alternative option | The contributor agrees that the alternative proposal is the way forward. They state that the current 'housing group' policy is too restrictive and can lead to very unsightly developments. An example is Huntlywood, between Earlston and Gordon. They agree that appropriate setting, design and materials are extremely important, but not only for individual houses outwith building groups but equally so in a housing group. (210) |
| Planning for Housing: Question 8 | Agree with alternative option | The contributor supports the alternative option for the Council's proposal for a more flexible approach towards housing. Housing in the Countryside which would allow for high quality development to be supported in individual locations. (294) |
| Planning for Housing: Question 8 | Agree with alternative option | The contributor agrees with the alternative option which would provide much more scope for those living and working in the countryside to remain in a similar environment when they retire. <u>Questions why new 'small settlements' are not supported.</u> (283) |
| Planning for Housing: Question 8 | Agree with alternative option | The contributor agrees with the alternative option and states that it may encourage some exciting architecture to happen in the area, but it would be important to impose strict controls to prevent incongruous developments which would demean the surroundings. Secluded locations for such developments would be non-intrusive and possibly more desirable to someone wishing to build a new home. Consideration would need to be given that these would be low energy/low waste homes in accordance with sustainability and climate change policies. (215) |
| Planning for Housing: | Agree with alternative | The contributor supports the alternative option for housing in the countryside and offers the following comments. Individual houses in the countryside of good design and location are to be welcomed. The |

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| Question 8 | option | effect of Brexit may drive an increased need for farm diversification and the alternative proposal provides some flexibility for the provision of rural housing. The average age of farmers is over 60 and in order to allow succession for a younger generation, new sustainable housing is required and the alternative proposal will help. (315) |
| Planning for Housing: Question 8 | Agree with alternative option | The contributor states that alternative approach is worthy of consideration. However, it needs considerably more detail. Whilst the use of exceptional design quality is highly desirable it should not preclude the creation of smaller, lower cost homes in the countryside as individual sites or groups of two or three. The contributor states that there is an opportunity for small self-build groups to benefit. (277) |
| Planning for Housing: Question 8 | Disagree with alternative option | The contributor objects to the alternative option for housing in the countryside. (95) |
| Planning for Housing: Question 8 | Disagree with preferred and alternative options | The contributor does not agree with the preferred or alternative option. (170) |
| Planning for Housing: Question 8 | Disagree with preferred option | The contributor objects to the preferred option for housing in the countryside. (95) |
| Planning for Housing: Question 8 | Proposes an alternative option | <p><u>Suggested Improvements to existing policy</u></p> <p>The contributor suggests improvements to the current 'housing in the countryside' policy. These are summarised and outlined below;</p> <ul style="list-style-type: none"> • The building group mechanism is good in principle, however difficulties arise from the definition of building groups and the criteria which control their suitability to absorb development • The phrase '<i>sense of place</i>' within current policy implies quantitative judgement. States that the definition needs to be finite and easily understandable, as '<i>will be contributed to</i>' is open to interpretation • Consider the approach to an isolated farm steading where the buildings straddle the road. The road is not the division which produces two distinct groups. Rather, they are sub groups of a definitive whole and the key distinction is between the buildings and the landscape • Question the criterion, '<i>sites should not normally break into undeveloped fields</i>' • The wording of the policy does leave some room for interpretation • Suggest that the policy should put design at its heart. The building group/sense of place criteria should be key criterion, and it ought to be coupled with a requirement for strong architectural design which properly respects the special dynamics and character of the group. |

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| | | <p><u>Isolated houses of exceptional quality (alternative option)</u></p> <ul style="list-style-type: none"> • Consider that many parts of the Borders countryside are capable of absorbing individual houses without harm • You cannot have too many individual houses without harm. Clearly you cannot have too many or you will get the proliferation you rightly wish to avoid • There is a need for people to live in the countryside, to care for it and to support village services. <p><u>Non-farming/forestry businesses</u></p> <ul style="list-style-type: none"> • There does not appear to be any room for other non-farming/forestry businesses • The countryside should not just be for farming and forestry, it could accommodate other small businesses. <p>(144)</p> |
| Planning for Housing: Question 8 | General | <p>The contributor states that appropriately sited and designed new homes in the countryside on a limited scale, can facilitate the development of new local businesses because the people who can afford developments tend to be successful entrepreneurial types. They suggest this policy might work, but steps would need to be taken to minimise the risk of simply creating additional retirement homes, which will then require additional services to be delivered.</p> <p>They suggest that any such developments ought to be required to meet tight design standards and ideally be on or close to public transport routes. Steps must also be taken to ensure such developments do not have negative impacts on the network of paths and trails. (196)</p> |
| Planning for Housing: Question 8 | General | <p>The contributor offers comments on both the preferred and alternative options for housing in the countryside. The contributor believes that there could be more flexibility regarding the housing in the countryside policies.</p> <p>The preferred option offers understandable control over development but does not seem to ensure appropriate design or screening.</p> <p>In respect of the alternative option, they believe that stand-alone, individual builds could also be supported, particularly eco-friendly and zero carbon builds. However, a strict set of conditions and high standards relating to setting, design and materials would have to be clearly in place, and ideally should apply to both the preferred and alternative option. (143)</p> |
| Planning for | General | The contributor raises concerns that housing in the countryside is an issue. Such housing can be disruptive |

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| Housing: Question 8 | | <p>to the few remaining wildlife corridors that link pockets of habitat. This sort of badly sited rural development is undermining a key natural resource of the Borders. The proposed alternative less stringent approach to housing in the countryside would make it more difficult to do this and should not be adopted.</p> <p>Raised concerns about despoliation of upland habitats, peatlands etc and wild life habitat pockets expressed in relation to housing in the countryside. The rarity value of the so far unspoiled mountains, hills and moorlands south of the Teviot must be recognised and have proper value placed upon it in terms of future tourism and biodiversity. (146)</p> |
| Planning for Housing: Question 8 | General | <p>The contributor states that there are shortcomings in the current '<i>housing in the countryside</i>' policy when applied to a settlement like Coldingham Sands, which is not defined as a settlement in the LDP.</p> <p>The existing policy formulated around small building groups tends to be defined by largely 2 dimensional mechanistic considerations and is much too crude a tool. They state that a more sensitive and sophisticated policy is required. This needs surely to be informed by urban design considerations including the architectural and special characteristics of the place and particularly by the character which the topography provides.</p> <p>The contributor makes reference to previous planning enquiries and applications within Berwickshire villages, in respect of the housing in the countryside policy. They state that they continue to need more people, so they need to find better ways of achieving better small scale expansion. To achieve this, it seems there needs to be an input of urban design skills into the LDP process to help create a policy more suited to settlements like Coldingham Sands than the 'Housing in the Countryside' policy.</p> <p>In parallel with the proposal for a more flexible policy for isolated houses in the countryside where houses are of exceptional design quality, the contributor questions whether something similar could apply to village development where, although not anticipated in the preparation of the LDP, a development if it were high quality would enhance and compliment the local setting.</p> <p>Question the requirement for structure planting on the fringes of villages to create a contextual landscape.</p> <p>The contributor put forward a paper for 'row housing' in modern rural development, as a contribution to the debate on how to achieve higher standards of design. (327)</p> |
| Planning for Housing: Question 8 | General | <p>The contributor states that town boundaries should be drawn and there should be limited expansion of these areas. (147)</p> |
| Planning for Housing: | General | <p>The contributor states that the policy should be viewed very carefully. In the Scottish Borders there are a number of large villages which have schools/halls/churches and an infrastructure which can cope with</p> |

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| Question 8 | | increasing households by 10 to 20%. There are also hamlets where the space is limited to infills without upsetting the equilibrium for country living and support services. (168) |
| Planning for Housing: Question 8 | General | The contributor states that brownfield sites should be preferred. (173) |
| Planning for Housing: Question 8 | General | The contributor states that any new housing should be restricted in the countryside. (181) |
| Planning for Housing: Question 8 | General | The contributor states that perhaps more flexibility is required when single houses are proposed out with an established settlement. (190) |
| Planning for Housing: Question 8 | General | The contributor states 'no' and the main settlements are the areas which should be developed Borders wide, developing very small settlements such as Eshiels will cause undue pressure on an already heavily laden services system. (179) |
| Planning for Housing: Question 8 | General | The contributor advises to let the countryside stay countryside. It is one of the lovely things living in the Borders, don't fill it with houses. If there are spaces within towns then fine, but don't take the town beyond its current geographical limits. (200) |
| Planning for Housing: Question 8 | General | The contributor states that they believe in and support small scale and individual developments in the countryside, that are in keeping with the surrounding area, without affecting the balance and harmony of the area or community. They are not in favour of large scale developments in rural environments that are wholly out of character and completely change the values and cultures of small longstanding communities. (201) |
| Planning for Housing: Question 8 | General | The contributor states that some of the criteria could be relaxed, such as excluding properties separated by a road. Flexibility should be permitted for a dispersed group if potential neighbouring properties do not have any objections. (214) |
| Planning for Housing: Question 8 | General | The contributor states that more small scale developments in the countryside should be allowed, up to a maximum of ten units per site. (222) |
| Planning for Housing: Question 8 | General | The contributor states that housing should be allowed on farm land or greenfield sites. (251) |
| Planning for Housing: Question 8 | General | The contributor states that in a climate of diminishing future use of private transport, extending housing in the countryside is going to create problems. Better to concentrate housing near to facilities. (258) |
| Planning for Housing: | General | The contributor states that planning applications for houses in the countryside should be judged on their merits. The idea that a house must be built near three other houses seems to be without real justification. |

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| Question 8 | | The idea (they suppose) is that it would put less strain on the Council services (rubbish collection) if a house is near others does not really stand up in today's world. (287) |
| Planning for Housing: Question 8 | General | The contributor states that small communities must be valued and protected. Developers are unlikely to see anything but profit when they look at fields, villages and pretty country towns. Putting houses in places that have primary schools with low numbers is good but there needs to be more/better high school places available. Existing schools cannot be put under any further pressure. (300) |
| Planning for Housing: Question 8 | General | The contributor questions why is it if you want to develop privately in the countryside it is difficult, but Councils can. (241) |
| Planning for Housing: Question 8 | General | The contributor states that allowing solitary home developments in the countryside will not alleviate housing need, because isolated properties are not going to be sheltered housing, first-time buyer housing or shared-occupancy properties. This is just a way to permit developers to create high profit large houses in the most desirable locations. (209) |
| Planning for Housing: Question 8 | General | The contributor states that the relaxation of the housing in the countryside proposed within the MIR, is not a logical response and in reality avoids the real issue of providing the certainty which a plan led system should provide. They state that it is not good enough to introduce a policy which may allow housing in the open countryside, by exception. Such an approach merely broadens the uncertainty and inconsistencies of the planning system. (156,264) |
| Planning for Housing: Question 8 | General | The contributor states that they have no settled view on this matter. They would be supportive of policy wording for either option which supports the delivery of well sited and appropriately designed rural housing. (213) |
| Planning for Housing: Question 8 | General | The contributor states that there should be no more housing in the countryside, farms are becoming property developers. (27) |
| Planning for Housing: Question 8 | General | The contributor questions how this proposal compares with how other Councils approach this issue, for example Aberdeenshire Council. (231) |
| Planning for Housing: Question 8 | General | The contributor states that, we should actively promote any housing development and that the three house options severely limit this. The alternative option is a more realistic way of encouraging individuals who wish to build sensitively in more remote areas. (291) |
| Planning for Housing: Question 8 | General | The contributor states questions how 250-300 units in a hamlet of 50 odd houses be deemed 'appropriate' in Eshiels. They cannot see the sense in restricting possibilities of helping meet the housing quota by rejecting the alternative provision – especially given the provisos stated. (197) |
| Planning for | General | The contributor agrees with the proposals for housing in the countryside. Stating, however there must be |

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| Housing: Question 8 | | strict rules to ensure that ribbon development does not occur and that the design and location of such new houses must be sympathetic to the surrounding landscape. (318) |
| Planning for Housing: Question 8 | General | The contributor states that they strongly disagree with the proposals. (194) |
| Planning for Housing: Question 8 | General | The contributor supports reducing the visual impact in rural areas of new or expanding building groups, and where permitted, individual homes, where these will not be screened by trees by insisting that they are painted almost any colour other than white or off white. Where developments creep up hillsides from valley floors, white buildings make our landscapes look dotty. Perhaps and so long as villages do not join up, ribbon development is less visually intrusive and should be encouraged where there is demand for new housing. (137) |
| Planning for Housing: Question 8 | General | The contributor feels this is a complete mistake. You will be losing a lovely area of countryside to houses that will look horribly dull. (268) |

QUESTION 9

Do you agree with the proposed existing housing allocations to be removed from the LDP? Are there any other sites you suggest should be deallocated?

QUESTION 9

Do you agree with the proposed existing housing allocations to be removed from the LDP? Are there any other sites you suggest should be deallocated?

| Main Issue | Sub Issue | Summary of Main Issues Raised |
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| Chesters | RC2B, Roundabout Farm | The contributor agrees with the removal of the allocation. (299) |
| Chesters, Earlston, Eyemouth and Preston | All sites proposed for de-allocation (RC2B, EEA12B, BEY1 & zRO16) | The contributor states that the sites should not be removed from the LDP and SBC should do a better job of promoting these areas to developers (e.g.) no cost of contributions to infrastructure in these areas whilst the cost elsewhere such as Peebles is increased (x5). (155) |
| Chesters, Earlston, Eyemouth and Preston | All sites proposed for de-allocation (RC2B, EEA12B, BEY1 & zRO16) | <p>The contributor states that they do not see the rationale for removing currently proposed housing allocations from the LDP, especially if this results in significant and inappropriate housing development in other locations. (166)</p> <p>The contributor does not understand why the sites are proposed for removal. (185)</p> <p>The contributor states that they do not understand why the sites should be removed. (258)</p> <p>The contributor states that they cannot support the removal of housing allocations from one area if it increases the pressure on mass development in their area. They want to see a fairer spread of development so that areas that have avoided development in the previous LDP may be considered for development this time around ahead of areas such as Peebles, that have already taken their share of development over the last 10 years. (201)</p> |
| Chesters, Earlston, Eyemouth and Preston | All sites proposed for de-allocation (RC2B, EEA12B, BEY1 & zRO16) | <p>The contributor states that they agree with the proposed sites to be de-allocated. (10, 95, 119, 127, 171, 181, 190, 192, 197, 206, 230, 235, 250, 259, 263, 285, 289, 290, 296, 311)</p> <p>The contributor states that the Report of Examination for SESplan 2 has recommended modifications that direct the constituent planning authorities to remove sites that have not delivered. Housing providers, through Homes for Scotland, will assist the planning department identify those sites that continue to blight the established housing land supply.</p> |

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| | | <p>This can be achieved through critically assessing the housing land audit to determine the effective housing land supply. This is a requirement of Scottish Planning Policy. (311)</p> <p>The contributor supports the proposed housing allocation site removals from those developers/land owners who, over an extended period of time, have failed to develop them or attracted interest in them. (312)</p> |
| Chesters, Earliston, Eyemouth and Preston | All sites proposed for de-allocation (RC2B, EEA12B, BEY1 & zRO16) | <p>The contributor states that they do not agree with the proposed sites to be de-allocated. (90, 170, 175,194, 216, 241, 268, 283, 292, 207)</p> <p>The contributor disagrees and states that by removing existing allocations, this increases the pressure to develop sites in Peebles. (150)</p> |
| Cockburnspath | BCO10B, Burnwood | <p>The contributor proposes a new housing allocation, this is summarised as part of Question 7, for site (ACOPA008).</p> <p>They state that if the Council were of the opinion that three allocations would result in too much development pressure, they consider that it is reasonable to suggest that (BCO10B) is deallocated and replaced with their proposed site (ACOPA008).</p> <p>They advise that (BCO10B) has not delivered over multiple development plan periods and as a result it cannot be argued to be effective and so should be deallocated to allow other development sites to come forward. A site should not be allowed to sit in a development plan to the detriment of the vitality of the settlement, particularly when other parties are keen to bring forward housing land. The contributor states that (BCO10B) has had a sustained chance to deliver and has failed. They further add that the combination of (BCO4B) and the proposed site brings the best option for the future growth of Cockburnspath. The sites have the potential to be delivered together.</p> <p>The contributor is of the opinion that the LDP review process must take a bold approach to ensure that housing sites are effective and can actually deliver housing. (132)</p> |
| Eddleston | AEDDL002, North of Bellfield | All housing in Eddleston should be removed until you deal with the lack of provisions in the Schools, Doctors etc. (158) |
| Eddleston | TE6B, Burnside | All housing in Eddleston should be removed until you deal with the lack of provisions in the Schools, Doctors etc. (158) |
| Galashiels | AGALA029, | The contributor is surprised at the distinct lack of housing sites proposed in the Galashiels area, |

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| | Netherbarns | particularly following on from the success of the Borders Railway link. Only one site has been identified, as an alternative proposal, for 45 units. Galashiels is the largest town in the region with a railway link, a university and a vital transport interchange. The contributor is of the view that the Local Authority need to be prepared for a major change in the town's fortunes in the near future. (24) |
| Galashiels | EGL17B, Buckholm Corner | The contributor welcomes the proposal to retain this site within the LDP2 for residential development. The contributor's client is committed to continuing to ensure and enable that the site is delivered to contribute to an effective housing land supply. The site is considered to be a natural housing site and therefore should continue to be allocated as such. (10) |
| Galashiels | EGL200, North Ryehaugh | The contributor welcomes the proposal to retain this site within the LDP2 for residential development. The contributor's client is committed to continuing to ensure and enable that the site is delivered to contribute to an effective housing land supply. The site is considered to be a natural housing site and therefore should continue to be allocated as such. (10) |
| Galashiels | zRO4, Plumtreehall Brae | The contributor welcomes the proposal to retain this site within the LDP2 as a redevelopment opportunity. The contributor's client is committed to continuing to ensure and enable that the site is delivered. (10) |
| Lilliesleaf | EL16B, Muselie Drive | The contributor acknowledges that a submission has now been made through the MIR process to remove the allocation. The contributor notes that the site has now been sold by their client. (10) |
| Lilliesleaf | ELI6B, Muselie Drive | The Lilliesleaf, Ashkirk and Midlem Community Council suggests that the site allocated in the centre of Lilliesleaf, now purchased by the community to make a village green, should be removed from the housing allocation. (93) |
| Melrose | Eildon View/ Fairways | The contributor suggests the de-allocation of EM4B (The Croft) in Melrose and suggests the allocation of land adjacent to Eildon View and Fairways in Melrose. The contributor notes the site is a contained site bounded on two sides by existing housing developments and would therefore be a natural continuation of these existing developments - adjacent to and below it - that of Eildon View and Fairways. On the third side it has trees and Chiefswood Road and on the fourth side there is a boundary of hedging to another open field above. This site would have none of the constraints of the Croft site, and its development would not adversely affect Dingleton Road and those already living on it, particularly throughout the period of building. Importantly, it would not be a development that damages the landscape setting of the Eildon Hills, yet would ensure the Council's adequate and effective housing land supply. (143) |
| Melrose | EM4B, The Croft | The contributors seek the removal of the existing housing allocation at The Croft, Melrose, considering it to be a wholly unsuitable site for residential development on the following grounds: <ul style="list-style-type: none"> • The site is on the lower slopes of the Eildon Hills within an NSA and AGLV. (2, 4, 5) • The site was considered, when allocated, to be a contained site that could fit into the landscape. This needs to be reconsidered. (2, 4, 5) • The site is a sensitive boundary for wildlife and the town. (2, 4, 5) • Housing development on this land would undermine the scenic quality of the Eildon Hills which is |

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| | | <p>important for the character of Melrose. (2, 4, 5)</p> <ul style="list-style-type: none"> • There are significant constraints on the site including: flooding, levels, civil engineering, traffic and ecology. (2, 4, 5) • The site is only efficient if the land adjacent is allocated for development too, this opens the door to sprawl up the Eildon slopes. (2, 4, 5) • The site could be deallocated without compromising the development needs of the Borders. (2, 4, 5) • The allocated sites at Lowood and Dingleton should be completed first before new development takes place to ensure impact on public services and traffic is adequately understood and catered for. (2, 4, 5) • Development would destroy the scenic qualities which local people and tourists value greatly and would have a detrimental impact upon the local economy. (5) • Development on the site would open the door to further development on the foothill of the Eildon Hills. (5) |
| Melrose | EM4B, The Croft | <p>The contributor's comments relate to this site which they propose for de-allocation. The site has a long and varied history, sitting as it does above the Malthouse Burn on the lower slopes of the Eildon Hills and development proposals there have always been the subject of a high number of valid objections.</p> <p>Indeed, when it was Ref. 02/01258/FUL, the SBC site assessment in 2004 stated '...this site is totally unsuitable for development purposes...it lies on the lower slopes of the Eildon Hills, with paths to these hills crossing the site...It is an existing wildlife habitat, important to be retained for public benefit...the riparian and woodland areas are diverse and valuable and there is an active rookery in a grove of mature larch trees...' There were several comments too about the poor management of the site by the owner.</p> <p>Until that time, previous Councils had refused development proposals for this site, because of its sensitive nature. However, in spite of all that, the Council at that time were under great pressure to approve sites in the so called 'core area' for inclusion in the LP because of the proposed railway reinstatement, and some 13 years ago it became an approved site.</p> <p>The developer objected in writing to the approved capacity of 25 units rather than 50, stating that he considered it was 'not viable to develop this site in an acceptable manner at that capacity.'</p> <p>For this reason the site has remained and still is undeveloped, but just a few months ago became the subject of an active planning application for 26 units, possibly in order to avoid de-allocation (Ref 18/01385/FUL)</p> |

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| | | <p>Given the developer’s opinion that development of this site is inefficient for that number of units, it must be his intention to develop other land he owns on the eastern boundary of the site, further up the Eildon Hills, and to the south, also on the Eildon’s landscape setting. This would result in development creep further up the Eildons’ landscape setting and would also be totally unacceptable.</p> <p>Constraints on the sloping Croft site cited by Council Officers are numerous and include flood risks, challenging topography levels, civil engineering requirements to create a new access road to the site, increased traffic from massive development at the former Dingleton Hospital site, and parking congestion on Dingleton Road, as well as threats to ecology - particularly the Malthouse Burn - which must be protected.</p> <p>Add to this the fact that the site lies squarely on the landscape setting of the iconic Eildon Hills - the beating heart of one of Scotland’s smallest National Scenic Areas - and it is understandable why this current planning application has drawn in over 120 valid objections, from near and far. Not surprising that people are shocked that development of this site is even being considered. With 300 walkers a week along its paths on the Eildons, as well as these hills being one of the Scottish Geodiversity Forum’s 51 best places to explore Scotland’s geology, it would seem that this site is unlikely to be able to deliver 26 units in any acceptable way.</p> <p>Were it now, in 2019, when the MIR states that ‘given the limited take-up of allocated housing sites and the limited number of new houses required, it is not anticipated that the LDP will require significant new housing sites’, the Croft site would be unlikely to be approved for housing development.</p> <p>The Croft is a natural green space, an area of undeveloped land with residual natural habitats, colonised by vegetation and wildlife including woodland and wetland areas - all features that the Scottish Government seeks to encourage and sustain, in and around settlements.</p> <p>The Croft allocation of 25 houses represents just 0.5% of ‘effective’ housing land supply. The site could be deallocated without compromising the development needs of the Borders.</p> <p>The MIR states that ‘A site is only considered to be effective where it can be demonstrated that within 5 years it will be free of constraints and can be developed for housing’. In the case of the Croft, this is proving to be very difficult indeed, and way over 5 years have passed. (143)</p> |
| Peebles | APEEB031, George Place | <p>The contributor considers that site APEEB031 George Place should be removed from the plan. The site has a capacity of 36 units and previously operated as a mechanics garage. The site was added to the HLA in 2006, however, no development has commenced in the thirteen years since, the HLA estimates development will begin in 2021 with completion by 2023. The site still does not have planning permission</p> |

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| | | having been refused in 2006 with no application since. The developer is listed as Techauto Ltd, this is the name of the owner who operated on the site previously, and there is no mention of a developer to bring the site forward. This is a brownfield site that can come forward despite allocation, but this should not be relied upon for meeting housing targets. (127 (1 of 3)) |
| Peebles | APEEB044, Rosetta Road | The contributor considers that site APEEB044 Rosetta Road should be removed from the plan. This site has a capacity of 100 units and was added to the HLA in 2016 which estimates units being delivered from 2021 at a rate of 20 per annum. Planning permission in principle was applied for in 2013 for mixed use development on site, this application is still pending decision as there appears to be a viability issue preventing agreement on development obligations. The site currently operates as a caravan park, it appears that development would see this site divided in two and operate as a caravan site at half the capacity with 100 housing units being developed on the other half of the site. (127 (1 of 3)) |
| Peebles | General | Contributors 150 and 207 states that they disagree with the removal of existing allocations, as their removal increases the pressure to develop sites in Peebles. Contributor 155 states that the sites proposed for removal should be left in. The Council should do a better job of promoting these areas to developers e.g. no cost of contribution to infrastructure in these areas whilst the cost elsewhere such as Peebles is significantly increased. Contributor 185 states that Peebles is bursting at the seams. More consideration should be being given to other sites such as Eddleston where there is local infrastructure in place (Primary School) which is under-utilised. (150, 155, 185, 207) |
| Peebles | MPEEB006, Rosetta Road | The contributor considers that site MPEEB006 Rosetta Road should be removed from the plan. Planning permission in principle was applied for in 2013 for mixed use development on site, this application is still pending decision as there appears to be a viability issue preventing agreement on development obligations. The site currently operates as a caravan park, it appears that development would see this site divided in two and operate as a caravan site and as housing. (127 (1 of 3)) |
| Peebles | MPEEB007, March Street Mills | The contributor states that site MPEEB007 March Street Mills should be redeveloped for community. (273) |
| Peebles | SPEEB004, North West of Hogbridge | The contributor states that they see no justification for the retention of SPEEB004 in the LDP, it should be removed. There is no likelihood of this site being developed unless or until a new crossing is built over the River Tweed. The only access to this site currently is via Glen Road which already a busy road; it cannot sustain further traffic. Because Peebles is a preferred location for developers, this should not be a reason to keep sites in the LDP that are unlikely to be developed. (318) |
| Selkirk | ASELK033, | Support the retention of the site in the LDP. Following the allocation of the site through the Housing SG |

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| | Angles Field | there have been various discussions with a number of developers to establish a plan for the delivery of the site in the very near future. There is a developer interested in the site and is looking to make an acquisition, the retention of the allocation would therefore be welcomed. Support from the Council's Flood Protection Team is also welcomed, this should, in turn, result in support from SEPA. (11) |
| Tweedbank | MTWEE002, Lowood | The contributor is of the firm view that this housing allocation cannot be allocated as an effective housing site and therefore should not form an allocation in LDP2 – it can only be a long-term opportunity. (92) |
| Tweedbank | MTWEE002, Lowood | The large land allocation at Tweedbank is rather an “all eggs in one basket” solution to housing land supply. (24) |
| Planning for Housing: Question 9 | General | The contributor states that broad proposals for removing allocations should be carefully considered. They appreciate the concerns highlighted in the consultation, but they consider that all means of facilitating development (particularly around removing blockages relating to infrastructure) should be exhausted before any decision to remove housing allocations is taken. (195) |
| Planning for Housing: Question 9 | General | The contributor states that it is a stupid idea, which is not cost effective, nor possible. (297) |
| Planning for Housing: Question 9 | General | Scottish Water state that they will work with the Council to ensure their investment plans are altered to take into account sites that are de-allocated from the LDP. Scottish Water would welcome any measures to ensure a greater level of certainty where they are required to invest in their assets. (323) |
| Planning for Housing: Question 9 | General | The contributor states that they understand that these sites are being removed primarily because of lack of landowner support. They would like to understand why more sites are being added which have the same issues as (MESH1001 and MESH1002) (239) |
| Planning for Housing: Question 9 | General | The contributor states that if existing allocations were defined in the past but have not yet been developed, it indicates that commercially-minded developers see no value in the locations even if SBC previously identified housing need. (209) |
| Planning for Housing: Question 9 | General | The contributor states that the current 'Infill Development Policy PMD5' sets out criteria that non-allocated sites must satisfy. It also states that developers are required to provide design statements as appropriate. The sites in Table 5 (page 44) of the MIR have site requirements set out for them in part 2 of the current LDP. These site requirements would inform required design statements. Therefore, while they do not disagree with their de-allocation they have some concerns regarding how the requirements, which were considered necessary at the time of LDP1, would be applied to these sites if proposals came forward in the future. (213) |
| Planning for Housing: Question 9 | General | The contributor states, sites that have been previously allocated but have not been started should be required to go through the 'Call for Sites' procedure again. (24) |
| Planning for | General | The contributor states that all farmland should be refused for housing. (27) |

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| Housing: Question 9 | | |
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QUESTION 10

Do you agree with the preferred option? If so, which other uses do you think could be allowed within Core Activity Areas? Do you think existing Core Activity Areas within town centres should be reduced in size, and if so where? Do you think existing Core Activity Areas should be removed altogether?

QUESTION 10

Do you agree with the preferred option? If so, which other uses do you think could be allowed within Core Activity Areas? Do you think existing Core Activity Areas within town centres should be reduced in size, and if so where? Do you think existing Core Activity Areas should be removed altogether?

| Main Issue | Sub Issue | Summary of Main Issues Raised |
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| Town Centres: Question 10 | Agree with preferred option | The contributor agrees with the preferred option within the Main Issues Report. (24, 27, 151, 153, 171, 181, 206, 215, 216, 222, 230, 243, 259, 262, 273, 274, 276, 277, 283, 290, 292, 296, 312) |
| Town Centres: Question 10 | Agree with preferred option | The contributor is in favour of the principle of Core Activity Areas as a driving force for ensuring appropriate action is taken to create and maintain thriving communities, however, will not make comment on the specific locations. (195) |
| Town Centres: Question 10 | Agree with preferred option | The contributor would support the proposal to maintain the core areas but with a greater degree of flexibility. If town centres are to be vibrant, they need to attract people and if shopping is no longer sufficient attraction, suitable alternative uses need to be encouraged. (196) |
| Town Centres: Question 10 | Agree with preferred option | The contributor requests the retention of Core Activity Areas with the existing primary aim to promote retail activity but extend the remit to encourage other elements that would bring footfall – eg use of premises for entertainment, tourist information, joint ventures, destination experiences eg cookery school etc that would bring people in and hopefully improve the business of the retail units. The contributor also requests that the concept of Core Activity Areas is not removed. (197) |
| Town Centres: Question 10 | Agree with preferred option | The contributor states that the size should not be reduced, let them thrive and be a desirable place to visit. (200) |
| Town Centres: Question 10 | Agree with preferred option | The contributor broadly agrees with the preferred options for Core Activity Areas and would like to see this expanded to include sports and leisure uses more generally. (239) |
| Town Centres: Question 10 | Agree with preferred option | The contributor suggests allowing a wider range of uses to be judged on a case by case basis depending upon the performance of the town centre in question. Current areas should not be reduced as they protect the diversity of each town. (273) |
| Town Centres: Question 10 | Agree with preferred option | The contributor thinks uses Classes 2, 10 and 11 make sense with all matters considered on a case by case basis. (277) |
| Town Centres: Question 10 | Agree with preferred option | The contributor feels that Core Activity Areas should be retained and that developer contributions should also be maintained. (289) |
| Town Centres: | Agree with | The contributor states that Core Activity Areas should be retained and not reduced in size. (290) |

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| Question 10 | preferred option | |
| Town Centres: Question 10 | Agree with alternative option 1 | The contributor states that in the larger town centres core activity could be more focussed to a smaller area. (153) |
| Town Centres: Question 10 | Agree with alternative option 2 | The contributor thinks the existing Core Activity Areas should be removed altogether. (95) |
| Town Centres: Question 10 | Disagree with preferred option | The contributor does not agree with the preferred option within the Main Issues Report. (184) |
| Town Centres: Question 10 | Galashiels | The contributor states 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. The contributor is disappointed at the image that welcomes visitors from the Douglas Bridge approach. The contributor thinks there should be a more positive statement on the potential for redevelopment/ regeneration in Galashiels town centre and of the measures to achieve this. (7) |
| Town Centres: Question 10 | Galashiels | The contributor was saddened to see that Galashiels businesses did not support the Galashiels BID for LEADER funding. The contributor considers there is a case for a Galashiels CARS scheme. (7) |
| Town Centres: Question 10 | Galashiels | The contributor is not convinced that the pilot relaxation of Core Activity Area policy in Galashiels will have any material effect on the vitality and vibrancy of the town centre. 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. The contributor would have no objection to a complete removal of this restriction, as is proposed for Hawick. Having said that, they are not suggesting that such designations be removed in any of the other town centres; Galashiels (and Hawick are far more complex town centres. (7) |
| Town Centres: Question 10 | Galashiels | The contributor states that Galashiels is the major retailing centre in the Scottish Borders, but the consumer £spend, and associated footfall (which is mostly from adjacent carpark to store), must be predominantly in near-to-town shopping complexes, the major retailing zone being the Tesco/ Asda/ Gala Retail Park area. With secondary retail park zones existing at Lower Buckholmside and the King Street/ Comely Bank areas. It would be an informative exercise to determine the £value of retail spend in these areas, compared to that within the 'town centre'. (22) |
| | | Following a Retail Gap Analysis study, SBC Economic Development undertook a survey of UK national |

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| | <p>enterprises who could potentially have a retail presence in Galashiels (and/or Hawick) – this identified approx. 60 nationals but, at that time (2017), there was no tangible interest from any of these potential investors in investing in Galashiels town centre. (22)</p> <p>The trends in consumer retailing purchasing habits are clear for all to see – no one can predict whether this will change but it seems unlikely that in the next 10+ years that there will be any reversion to old habits. There is likely to be more pressure on bricks and mortar retailers which will come from several fronts. The continued impact of online consumer purchasing in an increasing digital world is unlikely to slow any time soon – if anything, new entrants, intent on disrupting existing online platforms and traditional retailers, will emerge. The digital world impacts the traditional world in various ways:</p> <ul style="list-style-type: none"> • We are now all used to being able to purchase ‘atomic’ products online – not so very long ago we did so in traditional retail stores . There is more choice online, it is price competitive and products can be delivered within a day or so if required. Consumers will buy more and more online. • The digital world will continue to disrupt ‘atomic’ products by killing some off altogether (as has happened with music vinyls/CDs and video rental stores) and replace them with ‘digital bits’ products delivered directly to a home or device such as a TV or phone or smart home assistant such as Alexa, with no need for any town centre/ retail intermediary. • The digital world has already, and will continue to impact service businesses, which use ‘atomic products’ as part of their business. Banks no longer require as many coins / notes, travel agents no longer have as many holiday brochures. • The digital world has disrupted and will continue to disrupt these types of service businesses plus Post Offices, Tourist Information Centres, all of whom have digital options to retain existing and attract new clients • The digital world will also disrupt how some ‘atomic products’ are made with the development of 3D printing techniques. This will allow for personalised atomic products to be ordered remotely, produced by specialised 3D printers and delivered directly. (22) <p>All of this will continue to impact town centres. In planning for the future, and thinking about Galashiels Town Centre, it seems reasonable to me to expect to see:</p> <ul style="list-style-type: none"> • Fewer banks/ building societies, certainly smaller banks, possibly a ‘Banking Hall’ which hosts multiple brands. • No newsagents – as printed paper costs increase per unit with falling physical circulation • Perhaps no shoes shops – we may have shoes personalised/ designed online, or sporting trophies personalised with the winner’s own face - all created by a 3D printer and delivered next day. |
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| | | <ul style="list-style-type: none"> • Libraries – are likely to become too costly to maintain in their current format • Churches are likely to continue to have to merge with falling congregations. • Large supermarkets coming under more online pressure for ‘atomic products’ and finding themselves with excess floor space – they may sublet this space with the ‘guarantee’ of footfall, which may cause further vacancies in town centre units. • An increase in the number of ‘online collection points’ – but more likely to be existing premises trying to add £value, rather than new business opportunities. • There may new developments with some bricks and mortar premises becoming ‘galleries’ where consumers can come and before purchasing from whatever online source is most competitive. This will require a new business model, where product manufacturers pay galleries to display their products, rather than the present model of retailers purchasing products. (22) <p>In Galashiels Town Centre, the potential of footfall when the Great Tapestry of Scotland Visitor Centre opens (forecast 50,000+ visitors p.a.) should hopefully attract some investment interest from new retailers, but probably smaller niche businesses. However, it seems unlikely that they will do much to seriously dent the volume of vacant properties in the Douglas Bridge / Channel St area, most of which are large footprint units of several 000’s sq ft and have been vacant for extended period of time, some several years. And that is before we see any further impact of the digital world! (22)</p> <p>It may be that small niche businesses do benefit from having a presence in a visitor destination zone, but it is likely to be that this is only a ‘shop window’ generating some £revenue, and that the premises they rent are primarily for manufacturing their products, with the majority of sales generated online. (22)</p> <p>It is difficult to see, by April 2020, that the key visitor approaches to the GToS Centre will create a positive impression of Galashiels and of the Scottish Borders. The Galashiels Master Plan aspires to the town becoming a recognised ‘visitor destination’ – to be that Galashiels town centre needs to look attractive and welcoming. (22)</p> <p>There is already some relaxation of Class 1 Retail – the Core Retail policy for Galashiels Town Centre should be suspended altogether for a period until 2021, to try and attract any usage of as many vacant units as possible on the basis that the town will look better than it does today! (22)</p> <p>The town centre will have to transform to become the niche retail (not core retail)/ leisure/ social/ food & drink/ entertainment/ housing and, if unable to be transformed, is likely require the demolition of some of the over-supply of what were retail units. (22)</p> |
| Town Centres: | Galashiels | The contributor states that the Council should be proactive at developing the site in its possession in |

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| Question 10 | | Galashiels instead of trying to market it for maximum profit. The Council should set an example of creative urban development rather than leave it to developers to come forward with proposals which have already done much to spoil the centre of Galashiels. (23) |
| Town Centres: Question 10 | Galashiels | The contributor suggests bringing cars back into Galashiels town centre. In the very first Local Plan approved in 1953, it proposed to demolish all buildings from the buildings fronting the Market Square back to The Glue Pot to provide parking. This would reduce retail floor space but given the massive increase since the introduction of two massive supermarkets, the contributor considers that the remaining floor space in the centre would be more in demand if they were smaller units. The contributor states this is counter to the Masterplan proposal for a wonderful pedestrian precinct but there is absolutely no need for an area for the sole use of pedestrians if you don't have any! Bin the planning approach to the car of the 50/60s and accept that without "treadturn" you are not going to increase "footfall". Home Bargains is proof of this. (29) |
| Town Centres: Question 10 | Galashiels | The town of Galashiels is in desperate need of regeneration in order to support the town centre. Millions of pounds have been spent on the Tweedbank railway. The actual town centre is getting more of a ghost town, maybe more housing would bring in more footfall to the local economy and more practical with the rail road straight to Edinburgh. It is understood that there are currently pockets of development going on in Galashiels. (43) |
| Town Centres: Question 10 | Kelso | The contributor states that the Core Activity Area within Kelso should be retained and protected. (288) |
| Town Centres: Question 10 | Melrose | The contributor supports and encourages High Streets like Melrose, which has almost every shop occupied. By not allowing anymore out of town shopping areas locally which dilute the money spent on the high street to the point shops become uneconomical. It is much easier to protect what we have than to try and recreate it once it has gone. The contributor also states everything must be done to support existing restaurants, pubs, hotels, B&Bs within the town which in turn are so dependent on the tourism industry. This helps to make a vibrant community. (82) |
| Town Centres: Question 10 | Melrose and Galashiels | The contributor does not think the Melrose/ Galashiels sites should be reduced but they shouldn't be implemented at the expense of other sites such as development opportunities in Tweedbank. (272) |
| Town Centres: Question 10 | Peebles | The contributor states that Peebles town centre is a disgrace - a mish mash of charity shops and cafes. Where are the small businesses? It's about time that there was some strategic thought given to filling the premises and less thought given to extracting every last penny in rent and rates from the occupiers - as you can see from Peebles this doesn't work. (240) |
| Town Centres: Question 10 | Peebles | The contributor states that the Core Activity Area for Peebles on the south side of the High Street ends at the close next to the Royal Bank of Scotland; The contributor suggests that the Core Activity Area should be extended to encompass the whole of the south side of the Eastgate to Tweed Brae. The premises currently there are two large retail outlets (both occupied), a church and the Post Office. (318) |
| Town Centres: | Peebles | The contributor states the Council should be prepared to reduce the size of Core Areas and allow a wider |

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| Question 10 | | range of uses so long as they are not unsightly and generate footfall. Peebles Core Area size looks OK at present. (96) |
| Town Centres: Question 10 | Selkirk | The contributor notes and generally agrees with the recommendations of the local Chamber of Trade whose members strongly request that frontage protection be identified and extended from Sainsbury's at the north end of the High Street down to the West Port (as far as Rowlands) and extended up Kirk Wynd - just beyond Halliwell's Close. This is to support the fresh investment to the Market Place. The contributor also notes that parking is a major concern in Selkirk (and other Border towns) and wishes: <ul style="list-style-type: none"> • to establish improved parking management to help facilitate a better flow of traffic and improved pedestrian safety in the centre of town • and, in parallel, to encourage the establishment of lower speed traffic (20mph zones) in specific traffic corridors through the town – to improve public safety and reduce emissions e.g. covering the section of the A7T from High School to Sheriff Court. (305) |
| Town Centres: Question 10 | General | The contributor states the extent should not be reduced, but we must permit freedom of movement between town centre uses, predominantly classes 1 to 3 and to some extent 7, 11 and hot food (sui generis) uses. The principal concerns should be to enhance the vitality and viability of the centre whilst protecting nearby residential amenity. Housing and office space should be permitted above street level where this can be accommodated in a manner to ensure good amenity for occupiers. (24) |
| Town Centres: Question 10 | General | The contributor suggests a rate reduction for businesses in town centre areas to encourage new business to use vacant properties. This would reduce business failures and encourage business start-ups in town centres. (25) |
| Town Centres: Question 10 | General | The contributor states that there is a need to be flexible and take case by case decisions. (151) |
| Town Centres: Question 10 | General | The contributor states it is essential that business rates are reduced on the High Street; the present rate structure drives away start up business, and puts off some national chains. (190) |
| Town Centres: Question 10 | General | The contributor requests that these are removed in relation to Hawick, a radical rethink is need of how our town centres are formed. Empty shops should bring fines on the owners via increased rates while reducing for those trying to succeed in Hawick move all retail to one half of High Street making a market town feel and turn the other end into housing. (192) |
| Town Centres: Question 10 | General | The contributor states town centres do not attract footfall by shoppers alone and supplementary uses such as in Use Classes 2, 10 and 11 may attract more visitors to town centres. (215) |
| Town Centres: Question 10 | General | The contributor believes that designation of Core Activity Areas should be retained and any changes managed very carefully. Once retail units, in particular, have been lost, they are gone forever and offer very little opportunity for regeneration of town centres. Whilst the document cites various reasons for pressure on our High Streets, the MIR is curiously silent on the part that business rates play in the viability and profitability of business that operate there. The MIR states that “if premises have been vacant for six months and evidence is submitted which confirms it has been adequately marketed for a substantial period |

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| | | of that time, then it will carry much weight in the decision making process”. This may seem reasonable on the face of it but it will be necessary to provide detailed guidance as to what is deemed acceptable and/or adequate marketing and then there needs to be robust policing of this policy with serious questions asked by officials who must have the power to request evidence in support of claims. If this aspect of policy is not sufficiently robust we are likely to see many of our town centres change in nature to the detriment of the well-being of the town in question. (318) |
| Town Centres: Question 10 | General | The contributor states that the high quality and vibrant town centres are important drivers in bringing tourism to the area as well as servicing the local community. The need for Core Activity Areas should be monitored and in towns such as Galashiels which is not performing thought should be given to removing this as has been applied to Hawick. (315) |
| Town Centres: Question 10 | General | The contributor states that emphasis should be on uses which encourage people to come together and new Activity policy recognises this. There are however too many commercial units and some pruning with conversion to residential is required though this requires understanding the subtlety of how different streets perform different functions and implementation is so difficult given current set up. (236) |
| Town Centres: Question 10 | General | The contributor states that Town centres need to be kept active and dynamic and we need to be creative to stop any decline. The contributor also agrees that varied uses should be encouraged if premises are standing empty. (243) |
| Town Centres: Question 10 | General | The contributor states that town centres will be facing huge challenges in the coming years given the burgeoning online retailing businesses. They need to be tackled radically with more facilities for social interaction for young and old. There needs to be more facilities for different modes of transport e.g. bikes, motorised scooters, tuktuks, self-driving vehicles in combination with more pedestrian only areas in the town centre, outdoor cafes, covered over high streets to protect people from the Scottish weather. (256) |
| Town Centres: Question 10 | General | The contributor states that town centres will improve if the burgeoning increase in traffic flow is lessened either by diverting it or encouraging more town centre walking access. (258) |
| Town Centres: Question 10 | General | The contributor states that many of the borders towns have large vacancy rates. It would be perhaps unique, but also useful for those in the core areas to be assessed for rates more frequently in order for market conditions to be taken into account more often. (260) |
| Town Centres: Question 10 | General | The contributor states that the signs of change in how we use town centres is already evident and will become increasingly so in the very near future. It is counter-productive to seek to maintain and defend a romantic notion that the planning system can sustain town centres or to restore them to what they were 20 or 30 years ago. (264) |
| Town Centres: Question 10 | General | The contributor states that much more flexibility should be allowed for different uses. (274) |
| Town Centres: Question 10 | General | The contributor states that no undertakers should be allowed in core area and less charity shops would be good but the contributor accepts that they are better than an empty shop. (283) |
| Town Centres: | General | The contributor states there are a number of historic examples of businesses locating in an area to take |

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| Question 10 | | advantage of incentives and as soon as the incentive is reduced or removed the council is held to ransom by the company. Where possible the development of residential accommodation in town centres above street level must be encouraged and where business identify space not required to support the business, could there be an option for the Council to take ownership and preserve both the fabric of the building and increase footfall through conversion to residential. Appreciate that finances are limited but if this is left to the private sector consistency and standards will not be at a required level. (289) |
| Town Centres: Question 10 | General | The contributor states it is impossible to look into the future with any accuracy. However, town centres are changing as people's shopping habits change. A short term solution to town centre abandonment could be to increase residential spaces in town centres. More people in a space will require local shops. It is not an overnight solution, but it may be inevitable. Changing shops to include wider community services where people will gather and in turn require retail services. Entertainment and collaborative creative initiatives could also help. There are multiple examples of small, sustainable creative businesses across the borders, therefore encouraging creativity and entrepreneurship will in the end deliver the results. But it is a long term game. The contributor does not believe you can simply 'encourage and protect' as laid out in the LDP. (295) |
| Town Centres: Question 10 | General | The contributor states that high quality and vibrant town centres are important drivers in bringing tourism to the area as well as servicing the local community. The need for Core Activity Areas should be monitored and in towns such as Gala which is not performing thought should be given to removing this as has been applied to Hawick. (315) |
| Town Centres: Question 10 | General | In relation to section 2.13 the contributor states that to support a meaningful consideration of the changing role of town centres 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. (73) |
| Town Centres: Question 10 | General | The contributor states that rural towns depend on people coming into them, usually by car as so little or no public transport. So, rather than trying to emulate urban areas' efforts to reduce car use, perhaps we should ensure there is adequate, short stay (say, max 2 hours), on street parking for local shoppers and well signed preferably free parking and covered cycle racks a short walk from town centres, especially in towns like Kelso and Melrose that attract lots of visitors - even if that means using some land already earmarked for business/industrial use. Berwick has a time card scheme to deter overnight campers etc. The contributor also acknowledges that retail as it used to be is dead so promote high streets as social hubs. Scottish Borders Council should actually be encouraging coffee shops, cafes, dental practices, GP practices, physios etc to locate to high street, and permit more reversion of high street premises to residential. (137) |
| Town Centres: | General | The contributor is pleased that the Council is considering non-retail businesses in town centres. The |

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| Question 10 | | contributor suggests looking favourably on tenants whose services cannot be obtained online and customers are required to visit the premises. The contributor states that any shops which are closed, boarded up, or covered in posters/graffiti etc always brings the area down and creates a terrible depressed feeling for the public and other shop owners. In these circumstances if this has been the situation for a long period it may be better to consider any non-contentious business. If the business fails to flourish you are no worse off but if it survives it is one less empty shop even if it is just breaking even. The contributor states a good example is Hawick which is considered to be very depressing and full of charity shops. Another example is in Eyemouth where the newsagent has been for sale for over one year and although it is in the town centre has not received one offer. (1) |
| Town Centres: Question 10 | General | The contributor considers it absolutely essential to maintain footfall and encourage visitors to come and stay longer is the provision of suitable toilets. The contributor raises concerns about the possibility of closing toilets in Peebles would not underestimate the number of visitors who will never return for days out if this was to happen. The contributor provides various examples of specific retail issues in the Scottish Borders, Edinburgh and East Lothian. (1) |
| Town Centres: Question 10 | General | The contributor states that any additional houses will lead to increased use of shops and supermarkets; of course this is to be welcomed, we do need a vibrant town centre which appeals to residents and visitors. However, it is increasingly likely, that should these developments occur, at least one new supermarket would be required to service the whole area. Where this could be built is a moot point; as said, there are very few, if any, suitable sites for the development of supermarkets or indeed further leisure facilities. (318) |
| Town Centres: Question 10 | General | Much is said in this section of the MIR about the need to encourage the improvement of our town centres; much is also made of the changing nature of retail and the impact that online shopping has on our town centres. The document uses these arguments to suggest that policies on town centres should be made more flexible to allow for a broader range of use. Whilst important not to have empty premises, care needs to be taken to ensure that retail premises are not lost forever. (318) |
| Town Centres: Question 10 | General | The contributor states that planning policy uses were valid in town centres years ago, when the area was also the main retail centre of the town. However, it is no longer relevant to assume that just because a 'zone' is a town centre that it represents a 'core retail' activity zone in the 21 st Century. (22) |

QUESTION 11

Can you suggest any site options within Central Berwickshire, preferably Duns, to accommodate a new supermarket?

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Can you suggest any site options within Central Berwickshire, preferably Duns, to accommodate a new supermarket?

| Main Issue | Sub Issue | Summary of Main Issues Raised |
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| Town Centres: Question 11 | Duns or Greenlaw | The contributor agrees with the requirement for a supermarket and suggests Duns or Greenlaw as a location. (230) |
| Town Centres: Question 11 | Duns | The contributor states that a supermarket in Duns would be utilised by people of Greenlaw who may otherwise shop in Kelso or further afield. (215) |
| Town Centres: Question 11 | General | <p>The contributor states that there is evidence in Galashiels that despite the proximity of recent supermarket developments to the town centre that footfall in the centre is reduced by the development. People drive to a supermarket to undertake a particular shop and do not have a mindset to visit other shops. If there is a specific need for a new retail supermarket within Duns, is there an option that this could be a smaller development in/closes to the existing town centre?</p> <p>The development of anything larger would have the same impact as the Tesco/Asda development in Galashiels and the Council would not want to ignore this impact. (289)</p> |
| Town Centres: Question 11 | General | The contributor questions whether they really need another supermarket? They state that the Council are forgetting local businesses and therefore losing those jobs. (297) |
| Town Centres: Question 11 | General | The contributor advises that they have no comments. (119) |

QUESTION 12

Do you feel the requirement for Developer Contributions could be removed in some parts of town centre core activity areas?

QUESTION 12

Do you feel the requirement for Developer Contributions could be removed in some parts of town centre core activity areas?

| Main Issue | Sub Issue | Summary of Main Issues Raised |
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| Town Centres: Question 12 | Agree | <p>The contributor supports the removal of developer contributions for change of uses between appropriate town centre uses. (24)</p> <p>The contributor supports the removal of developer contributions, in some parts of the town centre Core Activity Area, where there is long term evidence of difficulty attracting development in town centres. (90)</p> <p>The contributor supports the removal of developer contributions for town centre regeneration for conversion domestic use. This is expensive work to undertake and developer contributions are a disincentive. (93)</p> <p>The contributor states 'yes/agree' in response to this question, in support of removing the requirement for developer contributions in some parts of town centre core activity areas. (27, 190,196, 206, 230, 259, 296)</p> <p>There is concern about the lack of development in agreed core areas, then removing additional costs for developers would seem a sensible incentive. (196)</p> |
| Town Centres: Question 12 | Agree | The contributor states that in line with a flexible approach which enables development that contributes to the resilience of our rural communities, they support the general principle of this policy. (195) |
| Town Centres: Question 12 | Agree | The contributor supports the proposal for developer contributions to be removed in some parts of the town centre core activity area, provided the developments are for retail purposes. (283) |
| Town Centres: Question 12 | Agree | The contributor states that this is a good starting point. It is all about viability and grant incentives are likely to be part of the equation. (236) |
| Town Centres: Question 12 | Agree | The contributor states that the combination of developer contributions and business rates will be a very effective way of accelerating the demise of town centres and facilitating the shift towards grocery and comparison shopping being conducted to your door by courier services from sub-regional centres probably located outwith the Borders. (264) |
| Town Centres: Question 12 | Agree | The contributor agrees that developer contributions should be removed or reduced to encourage development in the town centre. (288) |
| Town Centres: Question 12 | Agree | The contributor agrees with the removal of developer contributions in some parts of town centre core activity areas. They state that there is a strong indication developer contributions is preventing them from taking up in a town centre. Perhaps a delayed developer contributions could be considered based on the success of the developer's enterprise after a set period of time. (215) |
| Town Centres: | Disagree | The contributor states that developer contributions should never be removed. It is too much of a soft option |

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| Question 12 | | for developers and only serves to reduce their profit margins. Income is desperately needed to improve infrastructure and developer contributions should make a significant contribution. (23) |
| Town Centres: Question 12 | Disagree | The contributor states 'no' in response to this question, not in support of removing the requirement for developer contributions in some parts of town centre core activity areas. (95, 171,178,179,181,184, 187, 222, 231, 240, 251, 258, 270, 276, 291, 292) |
| Town Centres: Question 12 | Disagree | The contributor states that they do not agree that there is a requirement for developer contributions to be removed in some parts of town centre core activity areas. (175) |
| Town Centres: Question 12 | Disagree | The contributor does not agree and states that developers must contribute to town centres as they make profits from new housing. (223) |
| Town Centres: Question 12 | Disagree | The contributor does not agree with the removal of developer contributions within some parts of the town. There is a need to put in infrastructure not just in their estate but the roads around the town facilities. (200) |
| Town Centres: Question 12 | Disagree | The contributor does not agree with the removal of developer contributions within some parts of the town and states that developers do not appear to have the best interest of the local people at heart, they should be required to do more. (250) |
| Town Centres: Question 12 | Disagree | The contributor states that developer contributions should be retained and used to improve the town in question as deemed appropriate by locals, eg community councils. (273) |
| Town Centres: Question 12 | Disagree | The contributor does not agree with the removal of developer contributions within some parts of the town. They state that especially given the reduction in real terms of the council budgets. (274) |
| Town Centres: Question 12 | Disagree | The contributor states that developer contributions are an essential component. (290) |
| Town Centres: Question 12 | Disagree | The contributor feels that the core activity areas should be retained and that developer contributions should also be maintained. (289) |
| Town Centres: Question 12 | Disagree | The contributor does not agree with the proposal to remove developer contributions and states that potentially inadequate service infrastructure should benefit from developer contributions and it is suggested that this can be continued at least in the short term. (305) |
| Town Centres: Question 12 | Disagree | The contributor states that they do not support the removal of developer contributions. They state that the plan reads like it is designed to accommodate developers rather than the local area. They must make the appropriate contributions for every development. (217) |
| Town Centres: Question 12 | Disagree | The contributor does not agree that development contributions could be removed in some parts of the town centre core activity areas. They consider that the issue of developer contributions is fundamental to the wellbeing of the whole region. Indeed, recent experience has shown a willingness of planning officers to consider significant reductions in developer contributions in Peebles. This is quite unsatisfactory given the desire of developers, repeated many times in the MIR, to develop sites in this area. (318) |
| Town Centres: Question 12 | Disagree | The contributor states that they do not support the removal of developer contributions. They state that income is desperately needed to improve infrastructure and developer contributions should be significant. (229) |

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| Town Centres: Question 12 | Disagree | The contributor does not agree with reducing the requirement for developer contributions. They state that given SBC's historic poor efficiency in collecting/enforcing developer contributions and obligations. (209) |
| Town Centres: Question 12 | General | The contributor states that if the Council cannot afford them this is a necessity, maybe lowering the amount depending on the potential earnings of the business. (151) |
| Town Centres: Question 12 | General | The contributor states 'no' in principle, if the development is in excess of a particular amount of money. It is vital that developers give something back. The amount would have to be arrived at by experts. However, for a smaller development, converting those to living accommodation would seem sensible, small scale and a contribution would not be necessary. (197) |
| Town Centres: Question 12 | General | The contribution states that developer contributions should be judged on a case for case basis for large scale new development or redevelopment. (24) |
| Town Centres: Question 12 | General | The contributor supports the proposal, but only where the development concerned does not create a significant impact on present conditions and infrastructure (eg if a development affected traffic volume/movement to the extent that physical traffic management measures were needed for road safety. (152) |
| Town Centres: Question 12 | General | The contributor states that we should be encouraging development and not overly taxing it (ie) rail contributions. (168) |
| Town Centres: Question 12 | General | The contributor states that development contributions should only be removed under extreme conditions. (256) |
| Town Centres: Question 12 | General | The contributor states that depending on the scale of the development, consideration could be given to removing developer contributions in some parts of the town centre core activity area. For example, converting an upper storey into one dwelling is ok. Converting 20 offices to flats without a contribution would not make sense as developer contributions are very necessary to maintain local services. (277) |
| Town Centres: Question 12 | General | The contributor states that only where there is a requirement for regeneration, should developer contributions be removed. This should not be a blanket policy. (282) |
| Town Centres: Question 12 | General | The contributor states that developer contributions should only apply in cases where the proposed development will not necessitate significant additional infrastructure/service financial input, which otherwise would have to be borne by the Borders Council Tax payer. (312) |
| Town Centres: Question 12 | General | The contributor states that where the towns need a boost thought should also be given to removing the need for developer contributions for small local businesses. Large chain stores should still have to pay developer contributions. (315) |
| Town Centres: Question 12 | General | The contributor states that they think the question is very site dependent rather than for more general consideration and as such should remain under the remit of the planners on a case by case basis. (239) |
| Town Centres: Question 12 | General | The contributor states that if it makes the difference to development proposals being viable and therefore actually happening then the contributions should be removed. (216) |
| Town Centres: Question 12 | General | The contributor states that in respect of schooling, a developer fee is required on all new homes for the Council to build an additional primary school and a new High School, or developers should have to build |

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| | | these facilities. This is required before any further house building takes place. The same should be for doctors surgeries. (147) |
| Town Centres: Question 12 | General | The contributor suggests that in today's market it would be great assistance if they did not apply in any circumstances where premises were not being restored, repaired or developed simply because it is not financially viable and the property lies as a derelict eyesore. A good example is the old town hall in Eyemouth which stands derelict with not even a toilet facility. (1) |
| Town Centres: Question 12 | General | SEPA advise that they have no comments. (119) |
| Town Centres: Question 12 | General | The contributor states that a developer fee is required on all new homes for the council to build an additional primary school and new high school, or developers should have to build these facilities. This is required before any further house building takes place. The same should apply for Doctors surgeries. (147) |
| Town Centres: Question 12 | General | <p>The contributor states that, in terms of developer contributions more generally, The White Paper 'People, Places and Planning' focussed on the importance of infrastructure to the delivery of the Scottish Government's development priorities. Many of the changes proposed in the White Paper have the potential to impact significantly on how Network Rail delivers new, and maintains the existing, railway infrastructure in Scotland. In addition, the recently published draft Planning (Scotland) Bill provides the primary legislation for the introduction of infrastructure levies; and it will be for secondary legislation to set out the mechanisms by which infrastructure providers, such as Network Rail, will be involved in working with local authorities to secure developer contributions.</p> <p>Network Rail is embarking on a drive to attract third party funding to deliver enhancement projects. This is based on the principle that third parties deriving benefits from enhancements should make a financial contribution that is proportionate to the benefits that they can reasonably be expected to derive. The Network Rail commissioned, independent report by Professor Peter Hansford, 'unlocking rail investment: building confidence, reducing costs' considers contestability and third party investment in rail infrastructure delivery and was published in August 2017. This is currently directed towards England and Wales but similar principles can be applied in Scotland.</p> <p>It is right that where the cumulative impact of new developments will exacerbate a current, or generate a future, need for additional infrastructure that appropriate contributions are made by developers. They understand the need for local planning authorities and infrastructure providers to work closely together to understand development impacts and appropriate mitigations and to ensure effective delivery.</p> <p>Network Rail should be clearly excluded from having to make developer contributions as a publicly owned company arm's length body of the Department for Transport (DFT). (294)</p> |

QUESTION 13

Do you support the preferred option? Are there any other matters relating to sustainability and climate change adaption which should be addressed? Do you have an alternative option?

QUESTION 13

Do you support the preferred option? Are there any other matters relating to sustainability and climate change adaption which should be addressed? Do you have an alternative option?

| Main Issue | Sub Issue | Summary of Main Issues Raised |
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| Delivering sustainability and climate change agenda: Question 13 | Support preferred option | <p>Support the preferred option as proposed. (145, 171, 199, 215, 230, 250, 253, 262, 263, 273, 274, 276, 277, 290, 296, 312, 315, 195)</p> <p>Supports the promotion of sustainability throughout their operations whether it be good working practices, minimising the need for travel, reducing waste and sustainable forestry practices. (101)</p> <p>We agree with the preferred option and consider that the SBC's proposed approach to LDP policies and proposals to ensure they promote the development needs in the interests of sustainable development and climate change to be appropriate. From a review of the background text outlining the main issue, we consider the MIR comprehensively outlines the key topics for climate change from the perspective SEPA's remit, and we acknowledge that with regard to flood risk that there is a need for ongoing communication between SEPA and SBC, specifically in regard to the allocation of sites behind Flood Protection Schemes such as that as the one proposed in Selkirk. (119)</p> <p>Support the preferred option. Insulation standards mandated for all buildings must be significantly raised. The inclusion of solar cells must be the default expectation. Heat-pump technology must be preferred over carbon-based heating. Policies must be developed in order to achieve these ends. (153)</p> <p>Yes, fully support this and NFU Scotland would welcome involvement in discussions relating to any change in policy. Agriculture and associated land uses already do and can continue to play a huge role in positive climate change adaption. (165)</p> <p>We support the preferred option. In relation to the Main Issue set out at paragraph 7.17, safeguarding routes for pipework is a key policy element identified by Scottish Government in their guidance on Planning and Heat. We support their recommendation that a key focus for planning authorities should be to "secure integration of heat networks and associated energy centres within multi-functional green networks." Planning for heat network infrastructure within green infrastructure and green networks should minimise disruption if infrastructure is either to be delivered at a later date or when maintenance is required. Delivering pipework that is integrated within open space and green networks could also be considered as efficient use of land as set out in Scottish Planning Policy. Identifying such multi-functional corridors at the LDP stage and in</p> |

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| | | <p>association with other aspects of sustainable growth, such as active travel routes, could also be considered useful to deliver on core aims of the planning system. We would support clear identification of these issues in LDP2. (213)</p> <p>Network Rail fully supports the measures put forward by the Council in regard to sustainability. Earlier comments as to the role that the railway can play at the very heart of achieving sustainability are again relevant. This is particularly the case as regards all forms of development at and around Tweedbank and Galashiels where public transport nodes have been positively planned in order to reduce reliance on the private car. (294)</p> <p>Scottish Water broadly welcomes the Council's continued support for sustainability and climate change adaption. We firmly support the preferred option to continue with the policies and proposals outlined in the LDP. (323)</p> |
| <p>Delivering sustainability and climate change agenda: Question 13</p> | <p>Support preferred option with further considerations</p> | <p>I support the policy but would add that this emphasises the need for development sites to be immediately adjacent to towns rather than at a distance from them even if the distance is relatively short. Proposed development sites MESH1001 and MESH1002 will, by being located a short distance from Peebles itself, result in significantly more of the most polluting type of road miles - those done before engines are fully warmed up. Mile for mile these are far more polluting than longer journey. (90)</p> <p>We support the preferred option but our organisation is opposed to commercial wind farms in the Pentland Hills and surrounding countryside. The thought of wind turbines over 200m in height is appalling. They will be visible for miles around. (169)</p> <p>Yes I support this but the Proposed development sites MESH1001 and MESH1002 are not adjacent to the town, which will mean more car miles, plus most will commute to Edinburgh for work. This means passing through Peebles en-route, more cars on heavily used roads. More car miles. (207)</p> <p>Generally support but there's no mention of addressing fuel poverty. Would like to see development of district heating especially in off gas areas. (272)</p> <p>Support apart from proposed development sites MESH1001 and MESH1002 as this will result in significantly more car use and not adjacent to town oplus majority will commute to Edinburgh. More cycle paths Electric pints for vehicles. Solar panels. (292)</p> |
| <p>Delivering sustainability and climate change agenda:</p> | <p>General</p> | <p>As these become increasingly prevalent, more charging points will be essential. (22)</p> <p>Development in the countryside with street lighting and additional car commuters have an adverse effect on climate change. (23)</p> |

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| Question 13 | <p>A critical issue that must be enforced. However, it is important that most of the requirements are handled in a manner that does not hold up the approval process, or require excessive costs on developers prior to approval being agreed, particularly with outline applications. (24)</p> <p>Use of cars should be discouraged through access to good bus and train services. (25)</p> <p>Transport policy, in particular the use of public transport and the Borders Railway, should be identified as key elements in delivering greater sustainability. (45)</p> <p>I do not support windfarms in areas which depend on tourism, or where the electricity network cannot handle full capacity operation so that the sites will generate taxpayer subsidies more than electricity. (96)</p> <p>We welcome the acknowledgement within the MIR that in order to increase efficiency of proposals, larger turbines will be required, however we have some reservations about the use of strategic landscape capacity studies in case-by-case decision-making for specific project proposals. It is important to note the limitations of such studies and Scottish Natural Heritage (SNH) have published a 'toolkit' on landscape capacity studies, which highlights that such studies cannot <i>"define the precise limit of development which can be accommodated within a given landscape"</i>, although they can <i>"give an indication of the capacity, or ability, of the landscape to accommodate change"</i>. We would therefore ask that the limitations of such studies are reflected within the development of the proposed LDP2 to ensure that projects continue to be assessed on a case-by-case basis cognisant of Scottish Government's wider policy ambitions for renewable energy. (99)</p> <p>The Scottish Borders already produces 8-9 times the amount of green electricity that Borders homes need mainly from big visually intrusive wind farms that have destroyed forever large tracts of our wild landscapes such as the Lammermuirs. I would, however, welcome more small scale point of use hydro and solar schemes where these are appropriate and are not visually or audibly intrusive and do not interfere with neighbours' homes or businesses. Also, as energy efficiency measures are still even more effective at reducing our CO2 emissions than renewable energy schemes, SBC could take the lead in requiring developers to include these in their industrial/commercial/residential projects, and in requiring SBC employees to implement these in their workplaces (schools too). (137)</p> <p>The LDP should refer to the overriding need to make provision for climate change. The recent IPCC Report advises that an extraordinary revolution is required in the profligacy which abounds in all walks of life if we are to avoid catastrophe. The next 12 years are critical they advise, so enormous change will have to be achieved within the life of the next Local Development Plan. (144)</p> |
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| | <p>SBC should be promoting the use of solar panels which can make a large contribution towards domestic electricity demand. Also better promotion of cycle routes, buses and electric-car charging units will reduce the number of fossil-fuel miles in the Scottish Borders. (155)</p> <p>Proposed development sites MESH1001 and MESH1002 will result in significantly more car miles as they are not adjacent to the town of Peebles and most people will commute to work in Edinburgh. SBC could be more proactive by insisting on solar panels on south facing roofs, on more electric car charging points, and on more cycle paths and good public transport. (172)</p> <p>The Borders Land Use Strategy should be used not just as a tool or guide in terms of biodiversity, but across the full suite of landuse options, such as forestry, building development, and recreation, inter alia. It is an extremely valuable, comprehensive and almost unique (in Scotland) exercise that has identified appropriate use of land for the region and should be the “go to” document for any operation that involves potential land use change. It should also be used to identify existing operations that are inappropriate in certain areas (such as buildings on flood plains, and commercial forestry and intensive agriculture [including sheep grazing] in sensitive water catchments) and seek to remove these or, at least, stop their expansion and deleterious impacts. Although “woodlands” and “forestry” are mentioned as discrete entities, the use of “woodlands” to describe all trees is used more commonly in the document. There should be a clear distinction between “woodlands” as native broad-leaf species of some commercial value but also of considerable ecological, aesthetic and recreational value; and “forestry” which is commercial conifer plantations, often near-monocultures, and of very limited ecological value. The two should not be conflated. Flood risk can be avoided in new developments by the simple expedient of not building in flood-prone areas. The presence of existing buildings in such areas, or flood prevention defences/structures, should not alter this approach. Flood risk can be avoided in new developments by the simple expedient of not building in flood-prone areas. The presence of existing buildings in such areas, or flood prevention defences/structures, should not alter this approach. (182)</p> <p>SBC could be more proactive by utilising wind and solar power in housing design, greater provision to support an increasing availability of electric cars, more investment in cycling paths and walkways and greater investment in electric powered public transport. (185)</p> <p>SBC could be more proactive. (186)</p> <p>In our opinion the aims in this section are too passive and unambitious. It is not enough to follow National guidance. Action is needed to encourage local change. As mentioned above, policy should be encouraging all development to be more energy efficient and to incorporate renewable energy generation. All development should be assessed to check it will support the aim of reducing carbon emissions. Large scale</p> |
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| | <p>windfarms have a role to play, but the benefits from these are not felt locally other than through voluntary "community benefit schemes". The Council should be seeking to support smaller scale renewable energy projects which are locally owned and managed. Grid constraints are real, but they can be overcome with the development of local smart-grids and through other new technology. We support the reference to the Scottish Governments' Land Use Strategy, and we strongly support the approach taken by the Borders LUS pilot. If we are serious about sustainable land-use, we need to take this approach further and we need a well-informed local debate about the implications of the current push for increased afforestation. More woodland creation (right trees in the right place) would probably be a good thing. The benefits of a significant additional area of commercial forestry is more questionable for all sorts of reasons, one of which is the degree to which climate change will make such forests much more vulnerable to fire or disease. A more diversified approach to the uplands especially could generate a range of public benefits (eg peatland regeneration, flood mitigation, enhanced landscapes, biodiversity, carbon sequestration and better access). (196)</p> <p>Environmental issues, sustainability and climate change merit a chapter in the LDP2. Previous developments do not seem to have been carried out to these criteria. Now is the time to change that and ensure developers answer this need. This is not a bonus add on - it is vital to the health and wellbeing of people in the area and the planet as a whole. (197)</p> <p>Preferred option supported and developers need to sign up to and actually deliver on low carbon construction, sustainable materials, their energy use and energy sources and that of whatever development they are building, noise nuisance both in construction and in the buildings themselves, ecological enhancement. The dismissive use of the term 'eco bling' by a member of the planning team at a public consultation meeting does not augur well for how seriously the Borders Council and its Planning Team take this aspect of the planning 'agenda'! It would seem absolutely vital that best practice and beyond should take the Borders into the second half of the 21st century with as little detriment to the area and planet as possible. We should be thinking about future generations. Planning permission should fully consider wider or future impacts in the widest sense eg will developments have recharging points for electric cars, ground source heat pumps - never mind solar panels eg as standard . Mentioning them but not insisting on them will mean they won't happen. (197)</p> <p>Support in general, but we fail to see how the two preferred Eshiels options comply as they are in the countryside and will lead to increased traffic and increased road miles to and from work. We agree, however, that sustainability must be encouraged in as many ways as possible. (201)</p> <p>Every car park should have an electric charging point. What have you looked into. Maybe better to be more visionary and employ perhaps university projects to look into sources of heat such as heat pumps etc. (203)</p> |
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| | <p>Glad to see some reference to using the LUS pilot as this is a start to developing an ecosystems approach to assist decision making. The big omission is a place making tool at a settlement as opposed to a site level. Some sustainability policies such as carrying capacity have yet to be embedded into the planning system. (236)</p> <p>“promotion of the need to reduce travel and encourage more low carbon transport choices...and reduce the need to travel by car.” Council must reconsider its transport policy and adapt this to changing requirements of residents and users, particularly in rural areas. Similarly reducing Council services which puts the requirement for individual households to recycle is not sustainable as this results in an increase in private car usage to access Local Recycling Centres. More local alternatives should be investigated. The work of Changeworks in Peebles is to be commended, however I wonder if a more proactive approach may increase the number of properties being upgraded. For example, is there is a register of properties where insulation could reduce fuel poverty and has this has been accessed to target uptake for this scheme? (214)</p> <p>SBC should be more proactive in creating sustainable traffic patterns by way of cycle paths and good public transport. Solar panels, together with more efficient heating systems (heat pumps - air, ground or water), should be promoted. More electric car charging points are required. Developments, which simply create commuter villages for those travelling will result in more car miles. I have already referenced the sites in Eshiels. (216)</p> <p>Wind energy is the future combined with small scale hydro schemes. (222)</p> <p>The SBC recycling policy is woefully inadequate as most plastics are single use. This requires joined up work with manufacturers. (223)</p> <p>SCB should insist on solar panels on South facing roofs, create more cycle paths and have a good public transport system. Having the latter, will reduce the pollution caused by the serious number of cars on the road. (229)</p> <p>The Ironside Farrar Landscape Capacity and Cumulative Impact Study 2016 gives much-needed and welcome clarity on the capacity of the landscape to accommodate wind turbines. The protections afforded to residential amenity in terms of exposure to Noise, shadow-flicker, separation distances from turbines etc were formulated when wind turbines of 75m in height were considered to be the norm and these protections should now be revised. Consent is being given for turbines twice that height located within 1,700 metres of peoples' homes, and the Council is clearly aware that applications for much larger turbines may be submitted in future. Separation distances between dwellings and wind turbines should be re-calibrated in proportion to the increasing size of turbines. Given the amount of renewable energy generation capacity already existing in</p> |
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| | <p>Scotland it is difficult to justify the destruction of high-quality landscapes in order to provide more and more electricity which may never be used. Constraint payments to wind farms in the Borders already run at ££ millions a year. SBC should always maintain the primacy of landscape constraints and residential amenity over any claim by developers that they need to construct increasingly large turbines to turn a profit. (234)</p> <p>No, I don't think it takes into account the key economic drivers for the local economy, namely tourism, nor the requirement for genuine low cost housing. The LDP2 seems to be driven by a desire to satisfy developers drive to higher profits rather than exercising any power to drive a broader vision. (239)</p> <p>Proposals (in Peebles area) will result in significantly more car /commuter traffic. More electric car points. More cycle paths through the town and surrounding area. (241)</p> <p>Confor recommends that the Local Development Plan include a commitment to refresh the Woodland Strategy. This should include:</p> <ul style="list-style-type: none"> • A comparison between the 2005 and 2019 Scottish Woodland Strategy figures (The recent Borderlands Report (2019) from the National Forest Inventory provides much of the required data.) • An assessment of the success of the Key Actions in the 2005 strategy • A reassessment of the economic, environmental and social priorities in forestry and woodlands • A new set of Key Actions. (242) <p>To really support and popularise initiatives such as the recently established PHS eco group- it encourages climate change awareness in children and is something they will then keep with them in their adult life. (249)</p> <p>All developments should be supporting the drive to minimise the impact upon climate change hence the Borders Railway corridor must have priority when considering any development. Development outside of that corridor should be stopped or severely curtailed. (252)</p> <p>I feel that any new housing developments should be future-proofed for the environment eg all new houses should have solar PV panels etc. (255)</p> <p>We should have more solar power, ground source heat, biomass provided closer to the end user e.g. solar farms. (256)</p> <p>Encouragement and support for individual/corporate measures to ameliorate building heat loss and encourage heat-preserving measures are important. (258)</p> <p>There is nothing unique on offer here that couldn't be achieved without a national park. (260)</p> |
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| | <p>The concept of sustainability as advanced in strategic planning policies is already discredited. A different view is needed of what sustainability means in a planning context. The extent to which the planning system can control lifestyle changes which govern what is and what is not sustainable ought to be recognised. (264)</p> <p>Support. However more needs to be done to recognise the benefit that developer contributions bring to local communities. An "unspoilt" landscape is no use to a community that is in dire need of investment. (283)</p> <p>The idea of planting forests to provide carbon sequestration and so mitigate climate change is good. But the current forestry practice of blanket forests of monoculture species and then clear-felling does nothing towards long term carbon sequestration. Most of the sitka spruce timber is used in paper, or other fibre products, or in building materials, all of which will have a lifetime which is less than the crop rotation of the trees (40 years) and so all the carbon which is captured by one crop is put back into the atmosphere before the next crop is cut. On top of this, a lot of carbon is released into the atmosphere when the trees are planted, and the rivers suffer from the run-off after each clear-felling. Monoculture blanket forestry which is clear-felled should be replaced by mixed species (native broadleaf) continuous forestry practice to achieve the climate change sustainability goals. (287)</p> <p>Support subject to (a) this not being at the expense of economic development and (b) encourage the use of hydro power bearing in mind there are three former water mills within Kelso. (288)</p> <p>Support the preferred option but it should be recognised in the plan that not all impacts require major investment. Some and / or increased maintenance in some areas for example gully emptying / cleaning can reduce flood risk minimize the requirement for expensive capital developments. Promotion of sustainability could be better and simple things like bulk purchase and onward supply of LED bulbs could encourage take up. The plan must have a strong focus on recycling, and must seek to clarify for households what can and cant be recycled. There is a lot of confusion as to what is recyclable in different areas and a lot of frustration that some things are still not being recycled once collected. The plan should also promote close working with business to support recyclable packaging and new businesses must be 'encouraged' by the planning process to be sustainable. (289)</p> <p>The first sentence of para 7.17 states: "The Council will continue to follow national guidance and policy in taking appropriate measures to address climate change issues". I think most rational thinkers would agree that one of the meanings of 'appropriate' in this context is 'proportionate'. Findings from Professor Jack Ponton state that his even-handed assessment means that the construction of any further giant, industrial-scale wind farms in the Scottish Borders will not be proportionate to the disbenefits of their impact on quality of residential life, landscape and visual amenity, as well as the ecology and environment of the Borders.</p> |
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| | <p>Within para 7.18 are the following sentences: "With the loss of feed in tariffs and grant aid it is inevitable that in order to increase efficiency and financial viability wind turbines will be manufactured to greater heights. It is anticipated planning applications for turbines up to and exceeding 200m will soon be submitted". While this may be factually correct in describing the likely intentions of wind energy developers, the assertion of inevitability could be deemed to be accepting that these larger turbines will have to be considered on the grounds of efficiency and financial viability. That would of course be misleading so I suggest different wording is used. I also suggest that, where the Council makes it clear that it must continue to judge applications against its landscape capacity and cumulative impact study, it should point out that the physical forms of a landscape, barring earthquakes or volcanic eruptions, are unlikely to change, and that therefore assessed capacity in 2016 remains valid and absolute, rather than relative to the increasing size of the turbines in applications. Landscape capacity does not change because financial feasibility is less favourable to developers. That would be like increasing the speed limit to 150mph because many cars are capable of that speed now. (152, 218)</p> <p>No government would allow electric vehicles to be governed by higher speed limits than other vehicles if manufacturers were to claim that this was the only way to increase electric vehicle use while being economically viable. That would be no different from a planning authority granting permission for large turbines in a landscape that did not have the capacity to contain them, while citing one of the reasons as the fact that smaller turbines would not be economically viable. Scottish Borders Council has a duty to reflect UK Government policy in its development plan, where it refers to reserved matters. Energy is a matter reserved to the UK Government. In the House of Commons recently our MP John Lamont noted concerns over the number of large wind farms in the Scottish Borders, before seeking an assurance that 'industrial' onshore wind would not be promoted by the UK Government over other forms of renewable energy which have less impact on local communities. During Questions to the Secretary of State for Business, Energy and Industrial Strategy, Mr Lamont said: "I very much support renewable energy but many of my constituents in the Scottish Borders feel we have our fair share of onshore wind." "So can the Minister assure me that nothing in Government policy will promote onshore wind farm development over other forms of renewable energy?" In response, Minister for Clean Energy, Claire Perry MP responded: "That is exactly the point of technology neutrality," referring to the UK Government policy that as many forms of renewable energy as possible should be allowed to bid for Government support to avoid supporting one type of energy over another. It is suggested that the Sustainability and Climate Change aim should make reference to technology neutrality in terms which show that SBC is not favouring one type of energy over another. (218)</p> <p>Scottish Borders Council has a duty to reflect UK Government policy in its development plan, where it refers to reserved matters. Energy is a matter reserved to the UK Government. Scottish Government's 'national policy imperative' to develop renewable electricity has moved from being a 'target' to 'not a cap' to 'ambitions', which are limitless. The same cannot be said of the capacity of the landscape to accommodate</p> |
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| | <p>wind turbines. The Borders Network of Conservation Groups welcomes Scottish Borders Council's Supplementary Guidance (SG) on Renewable Energy, based on the updated Ironside Farrar Landscape Capacity and Cumulative Impact Study 2016 which has defined the capacity of the Scottish Borders landscapes in terms of wind farm development. It is obvious that although wind turbines may increase in size in response to changing financial feasibility, the receiving landscape, together with its capacity to accommodate wind turbines, will remain the same. Issues of scale are now critical. We therefore strongly suggest that there should be no implication within the LDP that wind farms with turbines of heights of 149.9m are now considered to be normal. We appreciate that anticipated future applications from wind farm developers may well seek wind turbines in excess of 200m in height but that does not make, or even contribute to making, 100-250m acceptable. The language in the MIR seems to suggest that Scottish Borders Council accepts that developers need larger wind turbines to make their desired profits in the absence of a subsidy régime, and that this can justify damage to landscapes where such large turbines cannot be accommodated. As a planning authority would the Council give permission to demolish the centre of Duns to clear a site for a new supermarket on the grounds that it would be more profitable than the existing food shops? We are particularly concerned that the requirement for Aviation safety lighting for towers and turbines in excess of 150m in height will bring a proliferation of polluting, high-intensity red lights, widely-visible across the night sky across the Borders. Unlike the Selkirk (238.8m) and Ashkirk (229.1m) comms masts where the lights are static and constant, the movement of blades passing across the lights on turbine towers will give the effect of rapid flashing. Mitigation by Radar-Activated Lighting will lead to lights switching on and off at random from dusk to dawn. This would appear to jeopardise any future consideration by SBC of the promotion of dark skies in order to help tourism. In the interim, we suggest policy should therefore presume against development proposals which produce levels of lighting which may impact on dark skies. The representation makes reference to concerns regarding proximity of turbines to residencies, quotes a number of references where it is argued that the need for further turbines is disagreed with and that Scotland's contribution to greenhouse gases is minimal. (160)</p> <p>No more wind farms please. They are an eyesore. (240)</p> <p>Given the cost of flood prevention and the suitability of the Scottish Borders to support alternative energy, it would be helpful for communities who resist alternative energy development to understand that such developments can potentially be used actively to offset cost of flood prevention. The council should promote a connection between the two. (291)</p> <p>Southdean CC supports delivering sustainable solutions which help address climate change. However the CC feels that the current policies are too narrow in focus and have the potential to damage our local area. The proliferation of wind farm applications has been felt in this area, and the height of the turbines proposed continue to increase. The potential size of the applications would transform the local area in a negative</p> |
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| | <p>manner. Scottish Borders Council must ensure that any proposals are weighed with local community views considered. (299)</p> <p>In terms of renewable energy the Selkirk CC notes that planning applications are likely to be submitted for taller wind turbines across the Scottish Borders (e.g. up to 200m in height) in order to increase their efficiency and is concerned that such structures which will have an accumulative and detrimental visual impact upon tourism and related leisure activities. Hydropower and solar arrays should be encouraged – in keeping with SBC’s recently adopted Supplementary Guidance on Renewable Energy which gives support to a wide range of types within appropriate locations. The option to use Common Good land where practical – eg for solar field arrays - has already been suggested and the adoption of such a more visionary approach to the guardianship of Common Good assets could significantly improve the financial return and o/a benefit for the Selkirk community (and others). (305)</p> <p>There is much debate about the encroachment of wind farms which can impact the community in many ways. Of concern are transportation issues during construction phases (as above), and the increased heights now being sought by developers to off-set subsidy withdrawal, resulting in very large turbines being considered. NDCC acknowledges that wind farms play a very large part in the Scot Gov renewable energy policy and we, more than most, are playing our part in working with developers to ensure the best outcome for all. Newcastleton continues to ask SBC to defend iconic landmarks so that views and experiences of visiting these are the same for future generations as they were for the previous ones. So much of our local economy depends on our surroundings which are precious. Newcastleton is seeking Dark Sky Status for a wide catchment area that surrounds us and hope to have secured this within a 3-year window. It will be important that any lighting required on developments within this catchment employ appropriate lighting measures to ensure that the dark sky status is not impacted. We continue to ask why planning policy cannot include Community Benefit Funds as a condition of the planning if it should be granted? Government subsidy is now removed so this is by no means a given now and developers have no obligation to provide one. NDCC fully understand that CBF is not a material consideration during the process and agree with that principle, BUT if planning is granted why can’t it be made a condition of the planning and linked to the development itself not the developer? Without formal recourse to protect the community we cannot seek to benefit from the funds that have been ring fenced for our needs. Communities have no capacity to sue companies who ignore protests if change of ownership or circumstance suit their needs. NDCC appreciate that local planning policy follows national guidelines but urge SBC to lobby for change so that the CBF’s can be used and administered to the communities they were designed to appease.(307)</p> <p>There should be less wind farms and a balance between agriculture and forest planting. (190)</p> |
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QUESTION 14

Do you support the designation of a National Park within the Scottish Borders?
If so, which general area do you think a National Park should cover?

QUESTION 14

Do you support the designation of a National Park within the Scottish Borders? If so, which general area do you think a National Park should cover?

| Main Issue | Sub Issue | Summary of Main Issues Raised |
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| Designation of National Park within Scottish Borders: Question 14 | Support for National Park with additional comments | <p>Support a National Park in general within Scottish Borders. (55, 151, 153, 179, 180,184, 192, 263, 293)</p> <p>Support a National Park. Do not overlook the beauty of the Tweed Valley and the adjacent Southern Uplands. Make sure SBC does not spoil the very thing that people value. (23)</p> <p>Support a National Park in Scottish Borders and would suggest one based around the St Mary's Loch Broad Law area where there is good access and opportunities for countryside recreation. (24)</p> <p>Support a National Park. Broughton to Peebles to Melrose To Jedburgh down to the English border including the Pentland hills. (25)</p> <p>Support a National Park in the Tweed Valley. (43, 95, 170, 229)</p> <p>Support a National Park which would improve qualities of life, health and well being, benefit tourism and attract investment and provide a further layer of protection to our much valued landscape. We believe it should, as far as practicable, be co-terminus with the Northumberland National park and that it should largely occupy the area indicated by the Campaign For a Scottish Borders National Park. We think it should also extend westwards from the Eildon and Leaderfoot National Scenic Area to include Scott's Designated Landscape and the Tweed as far as Traquair, before swinging south to encompass the lands of the ancient Ettrick Forest by including its southwesterly tributaries of Yarrow, Ettrick, Ale, Borthwick and Teviot. (60)</p> <p>Support extending the Pentland Hills Country Park into Tweeddale. (96)</p> <p>It would make sense for the Scottish Borders to march with the Northumberland National Park, and we agree it should be broadly based on the Cheviot Hills and Roxburghshire. (105)</p> <p>Support the proposal to consider a new national park centred on Scottish Borders, if there is strong local backing for this proposal. At this stage we have no strong opinion on where the exact boundary should lie. (107)</p> <p>Support a National Park within the general area of the Scottish Borders proposed for consideration. (116,</p> |

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| | <p>301)</p> <p>Supports the designation of a National Park within the Scottish Borders in respect of a viable area, to include the uplands and foothills of the northern Cheviots adjoining the Northumberland National Park and the Border Ridge. (124)</p> <p>Strongly support the proposal for a National Park in the Southern Borders (SBNP) that encompasses the largest area of four options in the SBNP feasibility study, and is run by a slimline National Park Authority with strong local representation. (137)</p> <p>Support a National Park in the Scottish Borders but feel it should be extended west from the Eildon and Leaderfoot NSA to include Scott's Designated Landscape and the Tweed as far as Traquair; then south to take in the Ettrick and Yarrow valleys and so include the Tweed's tributaries of Yarrow, Ettrick, Ale, Borthwick and Teviot. Possible extension east into Berwickshire. (143)</p> <p>I do agree with the suggestion of a National Park within the Scottish Borders. Glentress, Yarrow Valley. (145)</p> <p>The proposal for a Borders National Park in southern / central Borders would be the best way of raising the profile of the Region in the minds of both Scottish, British and international holiday makers and tourists. Whatever boundary is chosen, all parts of southern and central borders will benefit because of the well-researched "halo" effect felt by areas surrounding existing NPs, and it would be wise to avoid diluting the benefits by making the NP area too wide and inclusive. For example, the Glentress / Peebles honeypot is doing fine as it is, and including it would continue to draw attention away from the neglected northern slopes of the Cheviots i.e. south of the Teviot. Scottish Borders Tourism Partnership is promoting a much needed marketing strategy addressing the same issues, but the benefits will only be felt while the money for this remains available. The best way to raise the long term profile of the Region is through an internationally recognised designation that means "excellence" and "must visit" to tourists. (146)</p> <p>3 potential areas - The Tweed Valley, Cheviots, Eildons. (147)</p> <p>Strongly support the designation of a National Park within the Scottish Borders, for all the reasons that the Campaign has given. I believe that the area of the former county of Roxburgh, more or less, would readily meet the criteria for national parks, as well as providing a proven means of boosting economic development in a part of the Borders which has suffered economically, relative to the rest of Scotland and the UK, for many years. I suggest that the question of whether towns close to the edge of whatever area might be settled upon should be in or out of the NP boundary should be left for those towns themselves to decide, eg</p> |
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| | <p>through the relevant community councils and relevant SBC councillors. For instance, if Roxburghshire were settled upon, the towns of Hawick, Melrose and Kelso should be allowed to determine whether they are located inside or outside the boundary. The decision to include the National Park proposal within this chapter of the MIR on Delivering Sustainability and the Climate Change Agenda may have had some kind of logic behind. I sincerely hope the location was not calculated to ensure that wind farm developers (who might understandably focus in particular on this chapter, perhaps in some instances, to the exclusion of all others) were spoon-fed the opportunity to make negative comments about the National Park idea. I might not believe this, but any cynic or even any open-minded man on the Hawick omnibus might perceive that as a possibility. The more logical thing to do in the final version of the Main Issues Report would be to include the main reference to the NP proposal in Chapter 4 on Growing our Economy (an aim which the Campaign Team believes to be the most significant for the National Park), with a cross reference in the chapter on Delivering Sustainability and the Climate Change Agenda. I also suggest that the Main Issues Report consultation should not be the only means by which the Council assesses the NP proposal. Since a principle driver would be economic regeneration it will be necessary for the Council to consider how to adequately assess the economic benefits predicted, and any other economic impact. (152)</p> <p>BNCG is concerned to promote the appreciation and protection of the unique and beautiful landscapes and amenity of the Scottish Borders and we enthusiastically support the designation of a National Park in the Borders. The potential for the Scottish Borders to be marketed as a tourist destination in this way is vast. The landscape in the Borders is our greatest asset in terms of developing a vibrant tourism economy, creating sustainable jobs, and tapping enormous potential to attract the urban populations of cities in Scotland's Central Belt, Newcastle, Carlisle and beyond. Yet, compared to the Highlands and Islands for instance, very few people outside Scotland (and quite possibly within Scotland too) know anything about the much more easily accessible Scottish Borders, let alone consider it as a visitor destination. The instantly and internationally recognized National Park brand could reverse this virtually overnight, at no expense to the Council, and, in the long term, at net profit to the Scottish Government. Since the Park would be wholly contained within one local authority area (unlike the two existing Scottish Parks) there would not even be a need for any additional bureaucracy as far as planning is concerned. It would make sense for the Scottish Borders to march with the Northumberland National Park, and we agree it should be broadly based on the Cheviot Hills and Roxburghshire. (160)</p> <p>I agree with the main thrust of the LDP2. In addition to that, it has been particularly pleasing to study the proposal for the Borders National Park. It would bring a much needed economical boost to the area, helping the development of the hospitality, recreation & leisure industry. Listening to Dr. Black's comments on British farming at Oxford conference earlier this year I believe it would give Border farmers opportunity to sell produce demanded by the increasingly discerning public today - fresh, simple, wholesome food. People's eating habits are changing - the Borders have so much to offer in terms of quality & individuality.</p> |
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| | <p>Historically, this has been a neglected corner of Scotland. Yet, it is so significant in the national history. People would be astonished to discover & enjoy this surprising destination instead of just passing through. (190)</p> <p>We support further exploration of the benefits of a National Park. Having such a well recognised designation in the region is likely to attract new visitors and could encourage new businesses to start and existing businesses to grow. We predict that the boundary of the park will be difficult to agree as it could potentially extend to cover the whole of the Borders - and indeed stretch into D&G. The boundary will also need to make sense on the English border (the boundary of the Northumberland NP does not make sense - as it stops at the border). We have argued for some time that we could be making more of the existing National Scenic Area designations which, if better promoted, could attract additional visitors right now, especially the Eildon-Leaderfoot NSA which you can walk to from Tweedbank Station if you knew it was there. (196)</p> <p>The Scottish Campaign for National Parks and The Association for the Protection of Rural Scotland have been jointly campaigning for several years for a strategic approach to the designation of more National Parks (NPs) in Scotland. Further information about the background to and activities of this campaign can be found on the project webpage for our joint Scottish National Parks Strategy Project - search for "Scottish National Parks Strategy". Our case for a national strategy for more NPs is set out in our 2013 report "Unfinished Business", which is attached to this response. Scotland has some of the finest landscapes in the world, many the equal of NPs in other countries. Scotland's first two NPs have achieved a great deal in their first decade and represent remarkable value for money. They inspire pride and passion amongst local people and visitors, and they provide a wide range of environmental, social and economic benefits to local residents, visitors and Scotland as a whole. We consider that these benefits should now be spread more widely, through a national strategy to add more parts of Scotland to the worldwide family of NPs. This would bring additional resources to places which deserve it, strengthen Scotland's international standing for environmental protection and support our crucial tourism industry. There is substantial national public support for NPs, and local support for designating further NPs in some parts of Scotland. Designating a special area as a NP is the best way to:</p> <ul style="list-style-type: none"> • generate a high profile • support its active management as well as its protection • encourage integrated planning and management by all public bodies, and • invest additional national resources in helping both residents and visitors to enjoy the landscape whilst conserving it for future generations. <p>Substantial political support exists for the creation of more NPs: four of the five political parties represented in the Scottish Parliament support the designation of more NPs, and representatives of these parties spoke in favour of more NPs in a Parliamentary Debate in May 2017.</p> |
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| | <p>PROPOSED SCOTTISH BORDERS NATIONAL PARK</p> <p>In "Unfinished Business" we identified seven areas which we consider meet the designation criteria for NPs. One of these areas was the Cheviots area of the Scottish Borders. The case for and description of the proposed Cheviots National Park was set out in "Unfinished Business" as follows:</p> <p>"The Scotland/England border runs along the ridge of the Cheviot Hills, so the southern flanks of the Cheviot Hills in England are included in the Northumberland National Park, yet the northern flanks in Scotland have only limited protection through Area of Great Landscape Value (AGLV) designation. However, the landscape quality of the northern side is as great as, if not greater than, that to the south, so there would be a great deal of sense in extending the Northumberland National Park into Scotland. This would be the first cross-border National Park in the British Isles, although this would not be particularly unusual, as there are several examples of cross-border National Parks elsewhere in the world. The Cheviot Hills feature extensive grassy moorlands with frequent rocky outcrops. The largely treeless valleys which cut into the uplands often allow open views to layered ridges of hills, giving visual depth to views into and within the area. Strong contrasts prevail between the remote, wild summits and the quieter, less dramatic valleys." This description sets out the underlying rationale for the initial SCNP/APRS Cheviots National Park proposal being based around the core area of the northern Cheviots adjoining the Northumberland National Park, rather than around other high-quality Borders landscapes such as for example upper Tweeddale or the Berwickshire coast.</p> <p>SUBSEQUENT DEVELOPMENTS</p> <p>A number of developments related to this argument have occurred subsequent to the publication of "Unfinished Business". The most significant of these has been the emergence of the Campaign for a Scottish Borders National Park and the preparation of the comprehensive and professional Feasibility Study which it published in September 2017. We were fully involved in and contributed to the preparation of the Feasibility Study. The Cheviots AGLV has been replaced by the Cheviot Foothills Special Landscape Area (SLA), following a review of local landscape designations by Scottish Borders Council. We now realise that a National Park in the Borders would not in fact involve "extending the Northumberland National Park into Scotland" nor would it be a "cross-border National Park", as it would in fact be a separate National Park designated under the National Parks (Scotland) Act 2000. However, if a Cheviots National Park were to be established, it would be likely that it would wish to co-operate closely with the neighbouring Northumberland National Park, for example through seeking close integration between the National Park Plans for the two adjoining areas.</p> <p>AREA THE NATIONAL PARK SHOULD COVER</p> <p>The boundaries of the proposed NP are statutorily required to be determined according to the conditions set out in the National Parks (Scotland) Act 2000:</p> <p>"(a) that the area is of outstanding national importance because of its natural heritage or the combination of</p> |
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| | <p>its natural and cultural heritage, (b) that the area has a distinctive character and a coherent identity, and (c) that designating the area as a National Park would meet the special needs of the area and would be the best means of ensuring that the National Park aims are collectively achieved in relation to the area in a co-ordinated way." Although the initial SCNP/APRS proposal in Unfinished Business was for a National Park centred on the northern Cheviots, several other high-quality landscapes lie nearby, including the Teviot Valleys SLA, the Tweed Lowlands SLA and the Eildon and Leaderfoot National Scenic Area (NSA). The 2017 Feasibility Study discusses possible boundaries in some detail, and makes a convincing case for the National Park to extend out from its Cheviots core towards the Tweed valley to include the areas around Jedburgh, Kelso and Melrose, and possibly also south into upper Teviotdale and upper Liddesdale. As a result of this the local campaign is understandably referring to "Scottish Borders National Park" as a working title rather than "Cheviots National Park".</p> <p>TOWN AND COUNTRY PLANNING All the experience gleaned by NPs throughout Scotland and the rest of the UK indicates that they are best placed to deliver effective services to local communities and to the landscapes in their care if they have both development planning and development management powers under the town and country planning system. All 15 NPs in the UK have development planning powers; the Cairngorms NP is one of only two which does not have development management powers. This split of planning responsibilities has proved to be unnecessarily complex and confusing for all concerned, including local communities, developers, local authorities and non-governmental organisations, to the extent that even the Cairngorms National Park Authority (NPA) itself is now calling for development management powers to be transferred to it. We therefore recommend that the Borders NPA should have both development planning and management powers.</p> <p>RESOURCES Scottish NPs are 100% funded by the Scottish Government, so the creation of a Borders NP would bring substantial additional resources into the area, although these would be made available to the NPA rather than to the Council. International evidence demonstrates however that NPs invariably generate considerably more income for the areas they cover than is spent on their relatively modest running costs.</p> <p>(208)</p> <p>We strongly support the designation of a National Park. We believe that the area of the former county of Roxburgh, more or less, would readily meet the criteria for national parks, as well as providing a proven means of boosting economic development in a part of the Borders which has suffered economically for many years. We suggest that there is a coherent, layered cultural heritage and history stretching from the Cheviot Hills, down through glens, woods and farmland to the Tweed, from ancient history (the Southern</p> |
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| | <p>Borders has more hill-top forts than any other part of the UK); through medieval times when the four abbeys built their fortunes on international trade in wool from their huge flocks of sheep grazing pastures from the Merse right up to the foothills of the Cheviots; and through the Borders reivers who rivalled each other in their exploits and made much of the land ungovernable for a period. Not only is the landscape rich in history, that history is visible today in the built heritage and landforms, and celebrated by all age groups in the Borders to an extent seldom seen elsewhere in the UK, for instance through the common ridings and similar festivals. It is a widely acknowledged effect of national park designation across the world that the towns and service providers just outside the boundary of a national park benefit economically as much if not more from that designation as do the settlements and businesses within the boundaries, through what is known as the 'halo effect'. Hence a 'Scottish Borders National Park' based on Roxburghshire would be highly likely to benefit all of the Scottish Borders. We suggest that the question of whether towns close to the edge of the eventual National Park area should be inside or outside the NP boundary should be left for those towns themselves to decide, eg through the relevant community councils and SBC councillors. For instance, if Roxburghshire were settled upon, the towns of Hawick, Melrose and Kelso should be allowed to determine whether they are located inside or outside the boundary. Whatever the case, each of these towns, and also Galashiels because of its situation on one of the main roads and the rail route heading towards the proposed Park area from the north, would inevitably become 'Gateway Towns' benefitting from the halo effect. It is equally likely that Earlston, even if not within the Park area, would benefit from southbound traffic towards the Park, just as Coldstream could benefit from traffic heading from the east. We also suggest that the Main Issues Report consultation should not be the only means by which the Council assesses the NP proposal. Since a principle driver would be economic regeneration it will be necessary for the Council to consider how to adequately assess the economic benefits predicted, as well as any other economic impact. (218)</p> <p>We support the preferred option but our organisation is opposed to commercial wind farms in the Pentland Hills and surrounding countryside. The thought of wind turbines over 200m in height is appalling. They will be visible for miles around. (169)</p> <p>Support a National Park. Suggested on area which extends and includes Melrose, Kelso, Kirk Yetholm, up to Norhumberland Council boundary, Newcastleton, land east of Hawick and Selkirk. (171)</p> <p>We support this initiative. It could provide an ideal way forward in combining conservation and enhancement of the Scottish Borders' landscape, history, heritage and culture with genuinely sustainable support for small businesses and growth of the economy. The general area it should cover would be perhaps the approximate area of the previous Roxburghshire. (173)</p> <p>The Tweed Valley Forest Park would be a good start and give more control on rampant development. (183)</p> |
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| | <p>Support a National park. Glentress would be an ideal spot. (185, 194)</p> <p>Support a National park which includes Upper Tweeddale, Yarrow and Ettrick Valleys with a wedge extending as far east as the Eildon Hills. (187)</p> <p>Support proposals in the manor valley hills around Traquair and Minch Moor. (189)</p> <p>Support a national park from Liddesdale up to Hawick. (190)</p> <p>Support. Should potentially include some of Tweeddale. (191)</p> <p>Support two. One to the east and one to the west so coastal and hill country. (197)</p> <p>We support the designation of a National Park in the Scottish Borders. We do not have a preference for where this should be located, but this should sit in an area where there is great potential for nature conservation. Of course a national park approach should not mean that the landscape out-with this area should not be managed with environmental considerations in mind, taking a landscape scale approach and aiming to preserve and enhance important features of the land such as ancient woodland and ancient and veteran trees. (199)</p> <p>We support the designation of a National Park within the Scottish Borders but find it difficult to reconcile this concept with the proposals to proceed with large scale developments in the countryside such as those proposed under MESH1001 and MESH1002. (201)</p> <p>Support a National Park in the area that covers the Tweed between Drumelzier and Walkerburn, Manor Valley and the Meldons. (204)</p> <p>Support. Jedburgh at the centre. Jedburgh has so much history and visitors would love to see all that is available in Jedburgh and surrounding area. Jedburgh doesn't have great big signs on the roads to encourage people to come and see what we have to offer. Other towns with less seem to be pushed more than Jedburgh. We have a fantastic Abbey, Castle, Mary Queen of Scots House, Ferniehirst Castle, Harestanes and a Brewery as well as swimming pool with fitness centre, sports centre, golfing, rugby, football, cycling and great walks with beautiful scenery. (211)</p> <p>Excellent idea, A Long and narrow Park, taking rivers and landmarks into account, but not restricting development which might encourage tourists into the area. e.g. upmarket chalets , and outdoor activities, as</p> |
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| | <p>found in other national Parks. (212)</p> <p>Support. Agree with suggestion to also include land adjoining St Mary's Loch along A708. (215)</p> <p>Support if it would help tourism. (216)</p> <p>Support a National Park in the Upper Tweed valley. (222)</p> <p>The whole of the Scottish Borders should be designated a National park. (223)</p> <p>Support a National Park but it would require a widely advertised consultation. (225)</p> <p>Support in Eshiels / Tweed Valley/ Peebles / Glentress Forest and all the surrounding Areas. (227)</p> <p>I support a National Park in the Borders. It should cover most of the Cheviots including Jedburgh and west to Newcastleton. (230)</p> <p>Support. Mainly the western Borders but a finger of land stretching east to capture the Eildon Hills and surrounding area should be considered to. (231)</p> <p>Support. I think it would make sense to locate the Scottish Borders national park so it adjoins the Northumberland national park, and provide clear walking/cycling/horse riding routes that cross boundaries between each park to encourage cross pollination on visitors to both. (232)</p> <p>I support National Parks in the Scottish Borders and i feel the Tweed Valley should become a National Park or even to be awarded a National Scenic Area for future generations to enjoy. (233)</p> <p>Yes, I do support the designation of a National Park in the Scottish Borders. It seems to be a very simple and cheap way to raise the pitifully low profile of the Borders as a recreational and tourism destination. The Borders landscapes are of exceptionally high quality, the cultural distinctiveness of the Common Ridings surely equal events like the Palio in Siena, yet it seems the Borders is content to slumber quietly without drawing attention to any of its amazing riches. It would not take much to develop the brand. Last summer I was driving in France and passed a sign by the side of the road; 'You are entering the Regional Park of the Dordogne'. I don't know how much it cost to make the sign and put it up, maybe less than €1,000, but I was instantly aware that I was suddenly in a special, better quality landscape. National Park designation would undoubtedly give a massive boost to the Borders economy by attracting interest, increasing visitor-spend and creating jobs. The infrastructure already exists and would benefit from further development. There is</p> |
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| | <p>huge potential. My question is how else could you possibly achieve this at such low cost and with so little effort? (234)</p> <p>Yes, absolutely, lets protect the Tweed Valley and further improve the tourist draw of the area! Specifically, there is interest both nationally and globally in Dark Skies (i.e. a lack of light pollution from streetlights). Places like Glentress Forest could benefit from this in the same way as the areas in Northumberland to the West of Alnwick have. (239)</p> <p>Yes - but I don't have enough information to make suggestions about location. (244)</p> <p>Yes, I support the designation of National Park within the Scottish Borders. To gain maximum benefit, I think this should include all of the areas proposed in the, feasibility study ie Newcastleton, Jedburgh, Kelso, Melrose, Newtown St Boswells and St Boswells. It should exclude Hawick, Selkirk and Galashiels. (See feasibility report Appendix 3 p121). (253)</p> <p>I support the designation of a National Park within the Scottish Borders. I broadly agree with the proposal shown on the Campaign for a National Park in the Scottish Borders website EXCEPT I would prefer that the western boundary ran the length of the A7 from Langholm to Galashiels. (262)</p> <p>Yes, it should cover the Eildon / Dryburgh areas around the river Tweed. (272)</p> <p>I think it is an excellent idea and would go far to delivering growth and investment while protecting and enhancing the Borders' unique and overlooked landscape and heritage. Any of the areas suggested in the Flexibility Study would be suitable. (274)</p> <p>I do support a National Park. The feasibility study seems to focus on the South Eastern borders which seems to miss the particular beauties of the Western Borders and the Upper Tweeddale National Scenic Area. (277)</p> <p>I am simply responding as a citizen of Edinburgh to say that the creation of a Borders National Park would help highlight the Borders as a stunningly beautiful place to visit. (278)</p> <p>Support. It should cover heritage town sites such as Lauder and scenic and recreation areas. (279)</p> <p>I strongly support the designation of a National Park within Scottish Borders. It would make a major contribution to the sustainable socioeconomic development of SB, and would protect the grossly undervalued landscape and cultural heritage assets which we have here. I think it should cover the</p> |
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| | <p>approximate area of the old Roxburghshire. It should involve modest setup costs and within a year far more than pay for its running costs through job creation and visitor spend. Note that SB would not incur any of these costs. (280)</p> <p>I think this is an excellent idea which would be a huge asset for the future development of the Scottish Borders as a tourist and leisure destination. The network of Drove roads would be perfect for development into superb cycling and pony trekking routes. It is essential we do not ruin these assets with infra-structure such as wind turbines. A Scottish Borders National Park should, I think, include as much of the wild, uplands and scenic landscapes as possible such as the Cheviot hills, the hills surrounding Hawick and the Teviot valley, extending north to include the Tweedsmuir Hills. (284)</p> <p>Yes I support it. It should include the Lammermuir Hills. (286)</p> <p>Yes I support it. It should be the old Roxburgh area. (287)</p> <p>Yes, we fully support it. Generally to the south of the Tweed, and including all of the hill areas at the headwaters. (290)</p> <p>Selkirk and its surrounding area offers many opportunities to support National Park status. (291)</p> <p>Absolutely. A National Park will provide the biggest marketing and brand boost the borders could wish for. Its a simple and very effective message that will draw in investment and creativity, helping the borders to thrive in the 21st century. (295)</p> <p>Yes, Bonchester Bridge area. (296)</p> <p>A reasonable idea, but looks like as usual the edges of the borders are not included as usual. They are out of the 'golden circle'. (297)</p> <p>Yes .This is supported by Southdean CC. The designation of a National Park would give reasons for people to come to the Scottish Borders. With improved connectivity there is a fear that direction of travel would be away from the Borders. A National Park would bring a sense of focus and allow local tourism businesses to thrive. Southdean CC would support the area proposed in the study which is effectively Roxburghshire, with a number of the major towns being Gateways. Southdean CC would be included within the broader scheme suggested, and we support the broader area suggested. (299)</p> <p>Yes, Tweeddale. (300)</p> |
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| | | <p>We agree that Borders National Park can bring benefits to the region and would propose that the park should extend through Ettrick to include upper Tweeddale. All of these areas have much in common, a shared cultural heritage, e.g. our common ridings, areas of outstanding natural beauty and a developing tourist industry as well as sharing many other common features. (318)</p> |
| <p>Designation of National Park within Scottish Borders: Question 14</p> | <p>Object to National Park within Scottish Borders</p> | <p>No more National Parks, these are turned into sports centres. ie Mountain Bikes which ruins natural habitat. (27)</p> <p>If there is no obvious area (which I don't think there is), then there is no need for a NP within the Scottish Borders. There must be UK or Scottish Government criteria against which to score areas suitable for a NP in a GIS type study. The fact that you haven't suggested any areas, and I can't think of any suggests a NP in the Borders is not required. (155)</p> <p>At a meeting we had in Denholm we were told that it would cost several million to set up and run. It appeared that the main objective was to encourage tourism; if this is so the money would be better spent supporting existing bodies which are already promoting tourism. I believe it would put another layer of bureaucracy on to what is already a well regulated area adding additional cost for no gain. The beauty of the Borders is its peaceful countryside. Putting too much emphasis on tourism could end up destroying what we already have now. For those reasons I object to a Borders National Park. I believe this would be the view of most farmers. (161)</p> <p>NFU Scotland does not support the designation of a National Park within the Scottish Borders. This decision was not taken lightly and is based on extensive consultation with our membership in the Borders. No members have come forward in support of the proposals, however many have demonstrated a strong opposition. Funding is considered an issue. Further restrictions on how farms operate would be an issue. The campaign is recognized locally as another method of reducing the chance of onshore wind energy production on a blanket basis. Without putting any additional money into the agricultural industry, and questionable amounts into the wider economy, we cannot support these proposals. We previously held a panel night for NFU Scotland members with speakers including the main campaigners plus a farmer from each of Loch Lomond and the Trossachs and Cairngorms National Park, one of which had positive experience and the other negative. An exit poll revealed that no farmer was in favour of the proposals and, given the comments received from members since asking for responses to this consultation that has not changed. The future prosperity of agriculture in Scotland as a whole is under threat from a wide range of issues. If financial support for the rural economy is to move to a more environmental bias post-Brexit and additional income can be gained by farmers by being in a National Park, then we could look at the proposal more positively. But not at this time. (165)</p> |

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| | <p>The Roxburghe Estates does not support the proposal for a National Park within the Scottish Borders. Those campaigning for a Scottish Borders National Park claim that evidence from other NPs demonstrates that a NP will create business opportunities by encouraging more visitors. The experience of those operating land based businesses within the Cairngorms NP does not support this claim. The aims of the NP which are defined in legislation tend to diminish economic and social development in favour of landscape and environmental interests. Sustainable development should be at the core of local government policy and the Roxburghe Estates considers that NP status is not the best means of delivering this. The level of spending shows that only a very small proportion of spending is directed towards tourism. Most money is spent on planning and administrative activities. The high proportion of expenditure on planning issues is believed to impact significantly on land management operations. Existing planning designations and policies in the Scottish Borders are sufficient to protect the region's unique landscape and designation of NP status to part of the Scottish Borders is not required. Farming, sporting and tourism are key sectors of economic activity which could be disadvantaged by the additional regulation and restrictions imposed by a NPA. The Roxburghe Estates fully supports the Borderlands initiative in encouraging enterprise and commercial activity and this is considered a more effective means of delivering sustainable economic development across the Region than a National Park with its principal aims focused on planning and conservation. (174)</p> <p>From the ecological and nature conservation perspective (eg, presence of significant wildlife species or populations of species, habitats or ecological processes) the creation of a national park in the Borders could not be justified. There are other parts of Scotland where such a designation would be significantly more valuable and warranted in terms of biodiversity interest and nature conservation. (182)</p> <p>The proposal doesn't seem justified. (209)</p> <p>I have read the feasibility study commissioned by supporters of the idea of a National Park. Using the figures therein of 1million to set up and 2million annually to run, I cannot support the proposal without evidence of real benefit to the Borders as a whole. The fact that there appears to be no consensus within the NP supporters as to the boundaries of the NP makes the proposal difficult to assess. I note at Appendix 4 of the feasibility study, page122, that there are apparently no SSI or NSA within SBC area. That is clearly wrong and perhaps demonstrates a lack of research by the authors, or perhaps is intended to mislead the reader. I live in an NSA! I do not believe a National Park designation is either necessary or beneficial to the Scottish Borders. Additional costs aside, there will inevitably be added bureaucracy and conflict will arise between the interests of the NP and the interests of the rest of the Region. I do not accept the argument that the whole region will reap benefit from a proportion being designated a National Park. (210)</p> <p>Don't support as proposed. Difficult to draw a boundary owing to quality within most of Scottish Borders.</p> |
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| | <p>(236)</p> <p>Don't support - it is another level of bureaucracy and cost for limited, if any, benefit. (240)</p> <p>No, totally unnecessary. The borders has little or no real wild land and it does not need this title. It will only limit development. (251)</p> <p>No, broadly speaking based on the current proposals and interaction the national park if proposed should focus on the towns only. The proposals so far are too broad brush and have not integrated with the more rural communities across the borders to address the issues that would be exacerbated there, particularly where internet connections are poor. (260)</p> <p>I think a National park could limit, not enhance, economic activity. (261)</p> <p>Don't support. (90, 276, 283, 292)</p> <p>Don't support – waste of time and money. (281)</p> <p>No ...if houses are being built everywhere .where is there going to be any green spaces left to make national park? (285)</p> <p>No - with the information currently available to us we are not convinced that Kelso should be included within a National Park. However, Kelso Community Council looks forward to being kept up to date with developments regarding the creation of a Scottish Borders National Park. (288)</p> <p>A National Park linking up with the Northumberland National Park may bring benefits in tourism and inward development, but the proposal raises more threats than opportunities and unless these threats are dealt with the concept should not be supported. The Scottish Borders countryside is a working and naturally evolving landscape which has been looked after successfully by farmers and land managers to date without the need for special designation. This landscape must not be preserved as in a museum but allowed to grow and change as it has done in the past. Extra bureaucracy, planning and restrictions on development would be counter productive and should not be allowed. Running and park management should involve local people and control should not be centralised. (315)</p> <p>NDCC have commented previously via various meetings and Cllrs about concerns and note that none of these have been addressed in the recently shared Economic Impact Assessment: <i>Risk Assessment/SWOT analysis</i></p> |
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| | <p>No details on risk assessment or a SWOT have been included in the EIA giving a very biased impression that all outputs will be positive. NDCC do not believe this to be the case particularly given our knowledge of local issues and challenges which already impact on our small rural and isolated community and are previously highlighted. Among the benefits highlighted in the EIA are Tourism, Halo effects, Attraction for businesses and Housing. We take the opportunity to comment on each of these in the context of our community:</p> <p><i>Tourism</i> – there are no detailed statistics to back up any claims, nor any quantitative data to support the argument that tourism numbers will swell by the amounts they claim. The sector pays one of the lowest wages in Scotland and it is a stated objective of SoSEP that this needs to be addressed as part of the new remit covering the south of Scotland, creating a national park linked to tourism will not help deliver that aim. Newcastleton wishes to retain its young people ensuring we continue to grow and develop with thriving local amenities. Whilst investment in new assets will be for the wider community, any assets must also enhance our tourism proposition helping to attract more markets throughout the year. This approach, led successfully by The Newcastleton Business Forum and Newcastleton Community Development Trust, has done much to ensure assets are developed to meet this aim. Constraining or inhibiting this strategy in any way imposing barriers to investment, development or slowing major capital infrastructure projects like R100 (digital broadband) and transport networks, will impact on the community development plan and ultimately our fragile economy. Newcastleton’s micro economy is hugely dependant on tourism, if we believed that being part of a national park would deliver monetary returns, we would support it. We believe that by investing in our own tourism assets and marketing them successfully we will grow our local economy faster and without constraint. We want NO BARRIERS to obstruct us in our ambitions. VisitScotland will confirm that the marketing model to attract visitors has changed hugely to what went before social media and new technologies. One size does not fit all and having a ‘brand’ or an umbrella under which we all belong will do nothing for attracting new markets. Visitors come for an ‘experience’ and then talk about it, via social media. This makes it affordable for individual business to market themselves and for communities like ours to build a brand that fits our place NOT have to work to fit a regional or national strategy that has no significance to us. Having a National Park will not enhance our marketing message, if anything, it puts everything on the same page; ‘Newcastleton, part of the Scottish Borders National Park’ has no point of differentiation to any other place within the national park, where is the value in that? Since 2004, following the Foot & Mouth outbreak that ‘closed the countryside’, Newcastleton has successfully created a tourism market based on the significant investment from European funding that enabled the 7stanes mountain bike project to become a reality. Local investment in new assets continues to build on that. We firmly believe that budgets would be better invested in new assets like extending dark sky status, which would have a wide-reaching benefit to many, rather than geographically ringfencing a large swathe of landmass and marketing it under one brand, limiting investment and stifling opportunity.</p> |
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| | | <p><i>Halo Effects</i> – Newcastleton has stated that it does not wish to be included within the proposed geographic boundary of the park however, we would benefit from the claimed halo effects if they materialise, but we suspect they won't.</p> <p><i>Attraction for Businesses</i> – those already trading within the proposed boundary may be happy to accept the park and its constraints, even though the planning function is to remain with the local authority, but presumably the national park will become a statutory consultee? It will still have the right to impose a view on any major development projects. This can only constrain likely investment not encourage it.</p> <p><i>Housing issues</i> – the report highlights a growth in the value of property by some 20%+ on current housing values as a positive. The complete lack of impact from this on local wages and home ownership is breath taking in its arrogance and assumption that this is a benefit to all. Our community, along with many other rural remote communities in the Scottish Borders, is struggling to keep our young people. Imposing barriers to home ownership – which is one of the attractions to make them stay currently – cannot be countenanced. Bringing R100 to every home is estimated to add 10/15% in terms of monetary value (although this will diminish when everybody has digital connections), and likely to have far bigger economic impact than the national park to the Scottish Borders. Budget needs to be directed to address this issue so that new enterprises can be encouraged and remote rural locations like Newcastleton can attract new 'home business' markets which will add real benefit to our local economy. Increasing the cost of entry to owning a house locally by 20% only benefits the current homeowner, it takes no account of the next generation of homeowners which we are striving hard to retain. Newcastleton does not wish to be included in any park boundary which has the potential to constrain us and stop us delivering our ambitions for the community. We firmly believe that the park will slow investment and development and we cannot afford for either to be a factor in our future. As a community we fully endorse the community empowerment act legislated in 2015 and are actively seeking ways we can plan a sustainable future to protect the lifestyle we all choose to live. We want nothing to stop us achieving that and believe the National Park will stop us, even if it borders our boundary. In conclusion NDCC continues to object to the proposed National Park in the very strongest terms. <i>Scottish Govt comment</i> - NDCC is reassured that the Scot Gov has no heart to support any change from the current status quo. An article published recently in the NFU newsletter Michelle Ballantyne, Conservative MSP for South Scotland, asked what its position is on the creation of a national park in the Scottish Borders. Answered by Mairi Gougeon MSP, Minister for Rural Affairs and the Natural Environment (30/08/2018): We will continue our work to protect and enhance the natural beauty of the Scottish Borders, while promoting sustainable and inclusive economic growth. The region is already home to several designated areas, including a National Nature Reserve, several Sites of Special Scientific Interest and Special Areas of Conservation. There are no current plans to designate new national parks in Scotland. This would have major cost implications and present several complex administrative challenges for local and central government, as well as the communities the national parks would serve. (307)</p> |
| Designation of | General | SBC says that support for this is unlikely to be material to the Scot Govt. BUT...what do we think? (93) |

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| <p>National Park within Scottish Borders: Question 14</p> | <p>SLE takes a pragmatic view to the creation of new National Parks and is neither opposed to, nor an advocate for them. We have a broad membership that includes some members that would be very keen to see new National Parks, some that would be opposed and others that remain unsure. This spread of opinion is perhaps to be expected given the range of land-based activities members are involved with. Below we highlight the five main areas SLE members have commented on in relation to a proposed National Park in the Scottish Borders.</p> <p>Planning: It is understood that the Scottish Borders Campaign for a National Park (SBNP) are promoting an administrable 'lite' planning model, one which would leave planning with the Scottish Borders Council and would see the National Park acting as a statutory consultee in planning matters. Uncertainty around what the actual planning model could be remains, with unease that a National Park could bring an increased level of planning regulation and/or restrict development and/or make the process of obtaining planning permission more arduous.</p> <p>Land Management Activities: There is uncertainty about how a National Park could affect land management activities, forestry expansion in particular was raised as an area of concern. There is some apprehension that a National Park could restrict commercial planting in favour of small scale native woodland planting.</p> <p>Housing: Affordable housing is recognised by members as being important to the Scottish Borders and is seen as crucial in terms of being able to retain and attract young people to an ageing population. Affordable housing in both the Cairngorms National Park and Loch Lomond and the Trossachs National Park is currently seen by those communities as a big issue. For both these National Parks there are examples where the time and cost of obtaining planning permission has been disproportionate to development, resulting in the supply of affordable housing failing to meet the demands of local people, while elsewhere the establishment of National Parks has seen house prices rise as demands for holiday homes make housing too expensive for local people. There are concerns that the above issues could be replicated in the Scottish Borders if the area was to become designated a National Park.</p> <p>Tourism: The tourism opportunities a National Park in the Borders could bring in terms of 'putting the Borders on the map', branding of local produce, attracting tourists and wider local economic performance that could be generated for the region are well recognised. While some members note the potential for enhanced business opportunities and diversification, other members feel the Scottish Borders already offers plenty of tourism attractions and opportunities which could be improved with better advertising, signage and road infrastructure; while others remain unconvinced about the added value a park would bring – with previous businesses having been established and then failed. For some the question remains 'why would a Scottish Borders national park make people stop, stay and spend money'. There are of course strong and diverse views across the membership on how beneficial tourism would be in generating additional opportunities and how these could take place without impacting or conflicting with existing land management activities. Unlike existing National Parks in Scotland and indeed Northumberland National Park, the Scottish Borders is intensively farmed. As such there is concern that in some areas tourism and</p> |
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| | <p>intensively farmed areas could be in direct conflict with one another, with the assumption being that a National Park would bring increased footfall and is likely to magnify existing issues around irresponsible access and livestock worrying.</p> <p>Board Representation</p> <p>It is understood National Park Board Authorities are made up of appointments by Scottish Ministers, Local Authority members, and people who live in the area elected by the community, with legislation placing an upper limit on the size of the Board. Whilst it is acknowledged that Scottish Land & Estates members would be entitled to stand for appointment, concern was expressed at the possibility that 40% of the National Park Authority Board could be comprised of people outwith the area who are not knowledgeable about the Scottish Borders local culture and economic drivers.</p> <p>National Park Boundary</p> <p>It is felt that the section contained within the feasibility study on proposed park boundaries and the rationale behind these is unclear and confusing, with the proposed four options difficult to understand – a point also acknowledged by SBNP. SLE suggests greater effort is needed to fully engage with stakeholders to better explain these options. With regards to the proposed boundary prepared by the SBNP and contained within Appendix 3 of the Feasibility Study several comments were raised by SLE members about the omission of areas of great scenic and historic importance from the boundary. These included areas such as the Ettrick and Yarrow Valleys, Tweed Valley and the Berwickshire coastline (St Abbs Head, Eyemouth). (195)</p> <p>This is a conflict, you cannot have a national park with loads of new housing on it. What is the councils vision. (203)</p> <p>National Parks in Scotland are intended to protect the environment. for example a primary driver behind the Loch Lomond & Trossachs Nat Park was to cope with the influx of visitors - day-trippers - coming into the area from the adjacent conurbations. The supporters of a Borders National Park are advocating more tourism - which is a laudable objective. But that is a development and not a protection objective. It is not clear to me what the proponents of a National Park in the Borders are trying or might be to protect. A dilemma then pivots around the area for a National Park.... its area if there is a legitimate need for and role for a Park to develop tourism, would be different for that objective from the area of a Park that was designated to afford protection to all or some of the environment or natural habitats. The supporters of a National Park may be confused about their (differing) objectives and hence confused about the area such a body might cover. (206)</p> <p>SNH Policy Statement Scotland's National Parks (Policy Statement No 02/04) sets out our position on this issue. At this time, our priority and focus remains the operation of Scotland's first two National Parks. We recognise that the evolution of other Parks may involve different models to those employed in Loch Lomond & the Trossachs or the Cairngorms, for example embracing sea as well as land, or resting in a single local</p> |
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| | <p>authority area. Our view is that proposals for additional National Parks should emerge from a broad consensus involving local community stakeholders and from Government and other national interests, as well as fulfilling clear aims for the management needs of an area and its outstanding natural heritage. Should proposals emerge for a National Park within the Scottish Borders, we would engage as part of these wider discussions. (213)</p> <p>The designation of a national park would be interesting however would this mean that those outside it would have less consideration as to the visual impacts of developments? There are small unique areas that may not be covered here. (243)</p> <p>Unsure about this. Would need more information. (250)</p> <p>Support only if it does not disadvantage the residents by strangling development. (258)</p> <p>Difficult question to answer, not sure what the specific attributes of the Borders are to be classed as a National Park when compared to existing National Parks and also not clear enough as to what potential benefits would ensue, financial support, economic benefits, tourism? (289)</p> <p>CEN CC welcomes the inclusion of the National Park proposal within the Main Issues Report, but from our perspective, it is too early at present for us to comment. So that all members may become more familiar with all the issues and implications, we have invited a key speaker from the campaign to address our Community Council to facilitate us in formulating our response. (312)</p> <p>Regrettably, the MIR lacks any balanced view as to the benefits or otherwise of such a designation. Selkirk CC notes that ultimately, this will be a Government decision but the consultation document merely asks for a 'Yes' or 'No' response without giving consultees an opportunity to gauge the pros and cons. Selkirk CC considers that the designation of a 'select' partial area could be potentially very divisive for those communities either within or outwith (and feeling excluded) – with consequent disparities in property prices and 'benefits' likely. The CC does not support the designation of a National Park within the Borders but suggests that it would perhaps better to promote the whole of the Borders area as a National Park where a concerted effort for environmental protection and tourism can be promoted – or not at all. (305)</p> |
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QUESTION 15

Do you agree with the proposed redevelopment sites to be allocated within the LDP2? Are there other sites within the Scottish Borders you feel should be included?

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Do you agree with the proposed redevelopment sites to be allocated within the LDP2? Are there other sites within the Scottish Borders you feel should be included?

| Main Issue | Sub Issue | Summary of Main Issues Raised |
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| Regeneration: Question 15 | Agree with preferred option | The contributor agrees with the proposed redevelopment sites to be allocated within the Local Development Plan. (23, 151, 152, 155, 171, 172, 181, 185, 192, 201, 206, 207, 209, 218, 229, 230, 239, 241, 259, 274, 283, 289, 290, 292, 296) |
| Regeneration: Question 15 | Disagree with preferred option | The contributor does not agree with the proposed redevelopment sites to be allocated within the Local Development Plan. (27, 43, 95, 194, 285) |
| Regeneration: Question 15 | All proposed redevelopment allocations | The contributor states that as the redevelopment sites involve existing buildings that would either be redeveloped or demolished for redevelopment of the site, the potential for the sites to host roosting bats should be considered in all cases. If allocated, each site should include a requirement for bat survey in the site requirements. (213) |
| Regeneration: Question 15 | All proposed redevelopment allocations | The contributor generally agrees with the proposed redevelopment sites to be allocated within the Local Development Plan. There are many towns and settlements within the SBC area which are in need of regeneration and redevelopment - for example parts of Hawick, Galashiels and Walkerburn where there are redundant buildings which could be redeveloped before they deteriorate to an extent that they should be demolished. There appear to be brownfield sites which should be earmarked for development before greenfield sites are used. As a result of the obvious success of the Borders railway, the rail corridor should be an absolute priority for mutually supportive industrial, commercial and residential development. (166) |
| Regeneration: Question 15 | All proposed redevelopment allocations | The contributor agrees with most of the proposed redevelopment sites to be allocated within the Local Development Plan. (168) |
| Regeneration: Question 15 | All proposed redevelopment allocations | The contributor states they do not know enough about these sites but the principle outlined seems sound. (197) |
| Regeneration: Question 15 | Eyemouth – REYEM007, Former Town Hall | The contributor advises that they require a Flood Risk Assessment, which assesses the risk from coastal water as well as overtopping processes and any interactions with the Eye Water. Re-development to a similar or less sensitive use would be supported by the contributor. An increase in vulnerability would only be supported if a detailed Flood Risk Assessment can demonstrate the site is free from flood risk and there is safe access/egress available. Sewer flooding will also require consideration. The contributor states the site may be constrained due to flood risk and advises that the site has a potential surface water hazard and water environment considerations. The contributor also states any foul drainage must be |

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| | | connected to the foul sewer. (119) |
| Regeneration: Question 15 | Eyemouth – REYEM007, Former Town Hall Jedburgh – RJEDB005, Former Tennis Court/ Ski Slope Hawick – RHAWI017, Former Peter Scott Building RHAWI018, Buccleuch Mill | The contributor states that the redevelopment of these sites has potential for positive or negative effects on their statutory interests, dependant on detailed proposals in each case. In general, the contributor is supportive of regeneration proposals which seek to protect and enhance the special characteristics of historic environment assets, and to secure a sustainable use for them, and would be content with the allocation of the preferred sites on this basis. (164) |
| Regeneration: Question 15 | Hawick – RHAWI017, Former Peter Scott Building | <p>The Scottish Environment Protection Agency (SEPA) require a Flood Risk Assessment which assesses the risk from the River Teviot and Slitrig Water. Redevelopment to a similar or less sensitive use would be supported by SEPA. An increase in vulnerability would only be supported if a detailed Flood Risk Assessment can demonstrate the site is free from flood risk and there is safe access/egress available. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Site will likely be constrained due to flood risk. SEPA advises that there is potential for land contamination and for lades/culverts to be present within the site given its previous use. SEPA also advises that the site has a potential surface water hazard and water environment considerations. SEPA requests that foul drainage must be connected to the foul sewer and SUDs must be provided for surface water. Depending on the use of the site there may be a requirement for permissions to be sought for certain activities from SEPA. (119)</p> <p>The contributor states the site's existing use appears to offer few opportunities to make connections between Howiegate and Buccleuch Street. Subject to the extent of change of existing buildings, redevelopment of the site may offer an opportunity to establish more direct links for walking and cycling between these streets. (213)</p> |
| Regeneration: Question 15 | Hawick – RHAWI018, Buccleuch Mill | The Scottish Environment Protection Agency (SEPA) requires a Flood Risk Assessment which assesses the risk from the River Teviot. Redevelopment to a similar or less sensitive use would be supported by SEPA. An increase in vulnerability would only be supported if a detailed Flood Risk Assessment can demonstrate the site is free from flood risk and there is safe access/egress available. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within this site. This |

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| | | should be investigated further and it is recommended that contact is made with the flood prevention officer. SEPA states the site will likely be constrained due to flood risk. Foul drainage must be connected to the foul sewer and SUDs to be provided for surface water. Depending on the use of the site there may be a requirement for permissions to be sought for certain activities from SEPA. SEPA advises that there is potential for land contamination and for lades/culverts to be present within the site given its previous use. SEPA also advises that the site has a potential surface water hazard and water environment considerations. (119) |
| Regeneration: Question 15 | Hobkirk – RHOBK001, Former Hobkirk Primary School | The contributors suggest the former Hobkirk Primary School be included within the Local Development Plan as a redevelopment site. (152, 218) |
| Regeneration: Question 15 | Jedburgh – RJEDB003, Howdenburn Primary School | <p>The contributor has reviewed historic maps and cannot find any evidence of a small watercourse. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues in this area. This should be investigated further and it is recommended that contact is made with the flood prevention officer. The foul water must connect to the existing SW foul network however it is not clear whether this is a proposal for housing or other type of development. The contributor also advises that the site has a potential surface water hazard and water environment considerations. (119)</p> <p>The contributor states the proposals should maintain and enhance existing access routes through the site, including at Grieve Avenue where there appears to be an opportunity to establish or formalise a connection from adjacent open space through the site to Howdenburn Drive. (213)</p> <p>The contributor states that the site appears to include an area of playing fields. It is not clear if this falls within the definition of an 'outdoor sports facility' as set out in the Development Management Regulations. If so, in later drafts of the Plan the contributor requests that reference be made to the existence of an outdoor sports facility at this site, and the need to take account of this in any development, with reference to SPP. In the event that the contributor has failed to identify any other such site, the consultation requirements of the Development Management Regulations will still apply and, where they are consulted, they will consider proposals against the provisions of SPP (specifically paragraph 226). (254)</p> |
| Regeneration: Question 15 | Jedburgh – RJEDB004, Parkside Primary School | The contributor has reviewed historic maps and cannot find any evidence of a small watercourse. The site is sufficiently elevated above the Jed Water. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues in this area. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Foul water must connect to the existing SW foul network. It is not clear whether this is a proposal for housing or other type of development. The contributor also advises that the site has a potential surface water hazard and water environment considerations. (119) |

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| | | The contributor states the Council should integrate the site with existing footpath network along the southern boundary. (213) |
| Regeneration: Question 15 | Jedburgh – RJEDB005, Former Tennis Court/ Ski Slope | <p>The contributor states the site adjoins the Jed Water on the northern edge. Opportunities should be taken to protect and enhance the Jed Water as part of any development. The contributor notes the site is proposed for redevelopment. The contributor would not support development where there is an increase in vulnerability at this site. For other uses, we require a Flood Risk Assessment which assesses the flood risk from the Jed Water, Skiprunning Burn, and small watercourses which flow through/ adjacent to the site. The flood risk is very complex at this location. Consideration should be given to any upstream and downstream structures and culverts which may exacerbate flood risk. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Site will be heavily constrained due to flood risk. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues in this area. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Given clear risk to site, the most sustainable solution here would be to revert this area to open space. Any foul water must connect to the existing SW foul network. It is not clear whether this is a proposal for housing or other type of development. The contributor also advises that the site has a potential surface water hazard and water environment considerations. (119)</p> <p>The contributor states the eastern site boundary is contiguous with the River Tweed Special Area of Conservation. The site should be included in the Habitats Regulations Appraisal of the LDP and a requirement for assessment should be included in site requirements. Existing woodland along the site boundaries should be retained and integrated into development. (213)</p> |
| Regeneration: Question 15 | Jedburgh – RJEDB006, Jedburgh Grammar School | <p>The contributor states that it appears that Meikle Cleugh may be culverted through this development site. Opportunities should be taken to de-culvert this as part of any development. The contributor notes the site is proposed for redevelopment. The contributor requires a Flood Risk Assessment which assesses the flood risk from the Jed Water, Skiprunning Burn, and small watercourses which flow through/ adjacent to the site. The flood risk is complex at this location. Consideration should be given to any upstream and downstream structures and culverts which may exacerbate flood risk. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Site will be constrained due to flood risk. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues in this area. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Any foul water must connect to the existing SW foul network. It is not clear whether this is a proposal for housing or other type of development. The contributor also advises that the site has a potential surface water hazard and water environment considerations. (119)</p> <p>The contributor states the site appears to host a pedestrian link between High Street and Friarsgate, via the school grounds. This link should be retained and enhanced when the site is redeveloped. Given the site's proximity to RJEDB005, a good outcome for redevelopment of both and placemaking in this part of</p> |

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| | | Jedburgh may be to prepare a planning brief for this area. Such a brief should include issues highlighted for each individual site as well as their relationship to each other, for example links between and through and opportunities to connect existing green networks through this area. (213) |
| Regeneration: Question 15 | Coldstream | The contributor states that the town with significant heritage assets that needs attention and has not benefitted from a CARS scheme is Coldstream. (236) |
| Regeneration: Question 15 | Galashiels | Network Rail supports the aims and intentions of the Galashiels masterplan which is seeking to facilitate the redevelopment and regeneration of opportunity sites within the existing town of Galashiels in a comprehensive and coherent fashion. Such an approach to development makes full use of the opportunities offered by the Borders Railway both in terms of triggering residential and commercial development opportunities with sustainable travel choices, both into and out of the settlement. These detailed proposals which consider good design and improvements to the public realm are supported as a means of achieving the Council's vision, economic development and housing objectives as commented upon above. The concept of 'the green line' and the creation of new public and civic spaces is actively supported, and detailed discussion with the Council concerning land owned by Network Rail alongside the railway and Gala Water to feed into this is invited. (294) |
| Regeneration: Question 15 | Galashiels | The contributor states that Galashiels has had a huge amount of investment for a new Railway Station, but the town itself feels like a ghost town. The contributor also states that Galashiels has millions of pounds of public money invested in it and development should take place along the new train route into Galashiels, and rejuvenate the town. (227) |
| Regeneration: Question 15 | Galashiels | The contributor states that Galashiels Town Centre desperately needs enhancement, particularly at street level; shopfronts, signage, street furniture and all paved surfaces. The contributor thinks the market square has potential to be greatly enhanced and even enlarged. The contributor also notes that the industrial heritage of the wool industry needs to be preserved with a significant attraction based upon this atone of the remaining mill sites. The contributor also mentions two mill buildings in Galashiels which may be suitable for redevelopment. (24) |
| Regeneration: Question 15 | Galashiels | The contributor notes that other sites should be included within Galashiels although no sites are identified. (276) |
| Regeneration: Question 15 | Galashiels and Hawick | The contributor states that Galashiels, Hawick and Penicuik all need regeneration (43) |
| Regeneration: Question 15 | Innerleithen | The contributor does not support any redevelopment in Innerleithen. (162) |
| Regeneration: Question 15 | Jedburgh | The contributor agrees with the preferred site allocation for redevelopment, with respect to the Cheviot Locality. (312) |
| Regeneration: Question 15 | Newcastleton | The contributor states that Newcastleton should be included as a rural development site to make best use of the opening of the Carlisle airport for commercial traffic. (287) |
| Regeneration: | Peebles | The contributor states that March Street Mill, Peebles should be redeveloped for the community. (273) |

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| Question 15 | | |
| Regeneration: Question 15 | Selkirk | <p>The contributor states that Selkirk has been fortunate recently to be part of the CARS programme and is now beginning to reap the benefits. However, it is also vital that the benefits of this investment are not lost or diminished by a lack of further commitment. It is therefore essential to identify future phases of work to remove remaining blight and create further opportunities for regeneration. The contributor wishes further consideration of:</p> <ul style="list-style-type: none"> • The impact of the A7T through the centre of the town and support for the establishment of a by-pass; • Public safety/ air and noise pollution/ structural damage/ disruption caused by heavy multi axle vehicles negotiating the A7T; • Lack of available parking and lack of parking management control; • Haphazard parking causing damage to footways and blocking pedestrian/ disabled access; and • Combining and making better use of the ground at the local police station, the small adjacent public car park and also at the adjoining 'vacant' church. (305) |
| Regeneration: Question 15 | General | The contributor states the sites should all be moved further down the Borders. There are far too many proposed plans for Peebles and hardly any in the other Borders towns. (184) |
| Regeneration: Question 15 | General | The contributor agrees with the proposed redevelopment sites to be allocated within the Local Development Plan but not at the expense of other good regeneration opportunities that may be presented in due course. (272) |
| Regeneration: Question 15 | General | The contributor considers redevelopment of the identified sites as essential for the future of the towns mentioned. It is vital that these towns are re-energised. The contributor states that Scottish Borders Council needs to help these towns where unemployment is high and vision for future growth is lacking. Development of business units here should be promoted strongly and given precedence over other applications in areas such as Peebles which is already full, with a creaking infrastructure. (155, 172) |
| Regeneration: Question 15 | General | The contributor states it is essential for the future of the towns mentioned that redevelopment takes place. However, development of business units should be promoted and given precedence in areas where rejuvenation is in more need e.g. unemployment high, future growth plans lacking. (207) |
| Regeneration: Question 15 | General | The contributor states that ongoing regeneration of Borders towns is essential. The Council should continue to help those towns where unemployment is high and where a vision for future growth is lacking. The contributor also states that the new development of business units may have to be supply-led, but clearly more rural locations in the Borders must be supported. Areas which are already fully developed, such as Peebles, should not be overloaded with further development. (216) |
| Regeneration: Question 15 | General | The contributor states that brownfield sites, when suitably restored and managed, can be of more value to the public as open space in urban areas. As such, they can provide a setting for community enjoyment and a "breathing space", rather than developments that might have limited benefit and seriously detract from the ambience and social value of an urban area. Consider, for example, how much more valuable to the general community are, for example, the town-centre public gardens in Galashiels or Wilton Lodge |

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| | | Park in Hawick, as open space than if they were built upon. (182) |
| Regeneration: Question 15 | General | The contributor states these towns need investment to increase the quality of life for existing and future inhabitants. Investment in business units would also help generate employment to sustain each ecosystem. (185) |
| Regeneration: Question 15 | General | The contributor requests that there is more focus on Liddesdale and Hermitage. (190) |
| Regeneration: Question 15 | General | The contributors support the regeneration of previously proud Borders towns in need of a lift, ahead of the development and possible scarring of successful and bustling towns. The contributor is surprised that Galashiels is not included as it should be the undisputed main town of the Borders and yet remains downbeat, and unwelcoming to visitors. There is nothing the contributors would like more than to see Galashiels be regenerated into a town of which every Borderer should be proud. Peebles residents should want to visit and shop in Galashiels not Edinburgh but that is not going to happen whilst it lacks the energy and drive that further investment might provide. (201) |
| Regeneration: Question 15 | General | The contributor states that any sites that can be redeveloped should be used before green field sites. (203) |
| Regeneration: Question 15 | General | The contributor considers there are areas of the Borders in desperate need of regeneration and investment. There is huge opportunity for planners to drive a win-win agreement with developers and other investors by appropriately channelling the land available for development. (239) |
| Regeneration: Question 15 | General | The contributor does agree with regeneration development in older brownfield sites. (243) |
| Regeneration: Question 15 | General | The contributor states that any undeveloped sites within towns should be given a time-limited ultimatum to develop or be compulsorily purchased at below market price by Local Authorities. (258) |
| Regeneration: Question 15 | General | The contributor states the proposed sites look ok but it looks as though more work should be done to find redevelopment sites across a wider area of the Borders. (277) |
| Regeneration: Question 15 | General | The contributor suggests that all brownfield sites be included within the plan unless there are specific reasons not to include. (289) |
| Regeneration: Question 15 | General | The contributor states that redevelopment of these sites is essential to the future prosperity of the towns mentioned. These towns need major reinvestment and better resources. Providing small industrial units to encourage small businesses could create jobs for Border people particularly young people. (292) |
| Regeneration: Question 15 | General | The contributor notes that the Council seeks to “ <i>promote the regeneration of town centres to make them vibrant and viable focal points within our communities</i> ” and they are fully supportive of such aspirations for town centres across the Borders. However the retention of listed buildings can make the regeneration of sites which include them very difficult and often completely financially unviable. The contributor requests that the Council are mindful and open to allowing flexibility in respect of identified regeneration sites across the Scottish Borders which contain listed buildings and work with developers to allow these sites to be redeveloped in a way which work both financially and also seeks not to detract from the |

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| | | character of the wider area. (10) |
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QUESTION 16

Do you support the principal of Oxnam becoming a recognised settlement within the LDP? Do you agree with the proposed settlement plan and its boundaries?

QUESTION 16

Do you support the principal of Oxnam becoming a recognised settlement within the LDP? Do you agree with the proposed settlement plan and its boundaries?

| Main Issue | Sub Issue | Summary of Main Issues Raised |
|---------------------------------|------------------------|---|
| Settlement Maps: Question 16 | Agree with proposal | The contributor supports the principal of Oxnam becoming a recognised settlement within the LDP, and agrees with the proposed settlement plan and its boundaries. (168, 171, 181, 197, 222, 230, 243, 259, 274, 289, 290, 296, 299) |
| Settlement Maps: Question 16 | Disagree with proposal | The contributor does not support the principal of Oxnam becoming a recognised settlement within the LDP. (95, 179, 248, 285, 291) |
| Settlement Maps: Question 16 | General | The contributor states the proposed settlement boundary within the MIR has been drawn to respect the dispersed radial pattern of the village and to allow (if necessary) for small scale infill development to accommodate possible future growth. It incorporates a wide strip of field frontage (extending to approximately 1.01 acres/0.41 hectare) to the north of the road continuing from Oxnam Green towards Oxnam Neuk Farm Cottages. This area has been included following consultations with Oxnam Water Community Council, and at the suggestion of, a local major landowner, and is one of three areas where this landowner feels "development may take place at some point although ... it is likely to be many years before development in these areas may be considered". (124) |
| Settlement Maps: Question 16 | General | The contributor notes that the proposed settlement boundary is contiguous with the boundary of the River Tweed Special Area of Conservation in places. While the European site would be a consideration whether Oxnam was designated as a settlement in the LDP or not, we recommend that the settlement statement includes clear reference to it and sets a general requirement for Habitats Regulations Appraisal of any forthcoming proposal(s). (213) |

QUESTION 17

Do you support the removal of the Core Frontage designation within the Newcastleton Conservation Area?

QUESTION 17

Do you support the removal of the Core Frontage designation within the Newcastleton Conservation Area?

| Main Issue | Sub Issue | Summary of Main Issues Raised |
|--------------------------------|--|---|
| Settlement Map: Question 17 | Newcastleton Core Frontage Designation - General | <p>Contributor 195 considers its members are best placed to answer this specific question.</p> <p>Contributor 215 states that a more reasoned response may be sought from those in the vicinity.</p> <p>Contributor 231 states that they are unsure about the removal of the Core Frontage designation within Newcastleton Conservation Area.</p> <p>Contributor 243 states that they are unsure about the removal of the Core Frontage designation within Newcastleton and would wish to defer to views of the local residents.</p> <p>Contributor 312 states that the views of the residents and Community Council of Newcastleton should have priority in this area. (195, 215, 231, 243, 312)</p> |
| Settlement Map: Question 17 | Newcastleton Core Frontage Designation - Agree with proposal | <p>The contributors states that they support the removal of the Core Frontage designation within the Newcastleton Conservation Area.</p> <p>In addition to the above support comment, contributor 289 also states that they consider that existing planning decisions need to be more consistent and also need to reflect that window replacements with UPVC can now be a suitable alternative to wood given that the same styles can be delivered in both finishes.</p> <p>Contributor 307 states that they are pleased to see that the local issue regarding potential changes to the Conservation status of the Newcastleton Conservation Area to allow a more lenient approach could be adopted has been included within the Main Issues Report consultation. This will enable homes to be upgraded and to capitalise on modern standards for windows, doors and renewable roof arrays if required or desired. The contributor stated that they sought clarity on the timetable for formal decision which is likely to be in 2/3 years. As this was a local matter with huge support it was felt that there was benefit in writing to SBC to seek leniency for applications between now and then. The view of officers was that this was not guaranteed and unlikely to be granted. (171, 181, 190, 192, 206, 230, 274, 276, 289, 290, 291, 292, 296, 307)</p> |
| Settlement Map: | Newcastleton | The contributor states that they would support the proposal to remove the Core Frontage designation within |

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| Question 17 | Core Frontage Designation - General | Newcastleton only if this is in the longer term interest of Newcastleton and provided the local community (via the Community Council) supports the proposal. (305) |
| Settlement Map: Question 17 | Newcastleton Core Frontage Designation - Disagree with proposal | <p>Contributor 209 states that the Council failed to regulate window replacement within the Core Frontage area in the past, so now it is proposed to remove the Core Frontage area designation. This is a daft idea.</p> <p>Contributor 252 disagrees with the removal of the Core Frontage designation within the Newcastleton Conservation Area.</p> <p>Contributor 277 states that they disagree with the removal of the Core Frontage designation within the Newcastleton Conservation Area. Inappropriate development in the past is not an excuse for relaxing at a later date. This approach just undermines planning control in particular to Conservation Areas.</p> <p>Contributor 280 states that they do not support the removal of the Core Frontage designation from the Newcastleton Conservation Area. The people of Newcastleton do not appreciate the importance of the appearance of the frontage to the village's tourism economy, which is probably the only source of growth in jobs and incomes in the village. It also enhances the value of the houses and makes them more saleable. SB's Planning Dept should take the time to explain to the villagers how they individually and collectively benefit from conservation status of the village and from preserving its attractive appearance. This cannot be done through the Community Council alone. It needs to be done through direct, face to face communication with villagers, and imaginative presentation which can be effectively understood by a remote rural community.</p> <p>(209, 252, 277, 280)</p> |

QUESTION 18

Do you agree with the suggested policy amendments identified in Appendix 3?
Do you think there are any other policy amendments which should be referred to?

QUESTION 18

Do you agree with the suggested policy amendments identified in Appendix 3? Do you think there are any other policy amendments which should be referred to?

| Main Issue | Sub Issue | Summary of Main Issues Raised |
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| Appendix 3 | All policies | The contributor agrees with the suggested policy amendments identified in Appendix 3. (171, 192, 206, 230, 259, 274, 283, 288, 296, 312) |
| Appendix 3 | All policies | The contributor generally agrees with the suggested policy amendments identified in Appendix 3. (215) |
| Appendix 3 | All policies | The contributor agrees with the suggested policy amendments identified in Appendix 3 as long as decisions are taken on merit and not made in an arbitrary way and that priority is given to sustainability and well-being of people. (272) |
| Appendix 3 | All policies | The contributor is of the view that all planning seems to be too heavily weighted towards accommodating the needs of developers resulting in a poorer service to existing residents. (222) |
| Appendix 3 | All policies | The contributor states that they do not agree with the suggested policy amendments identified in Appendix 3. (311) |
| Appendix 3 | All policies | The contributor states that they firmly support the preferred option to continue with the policies and proposals outlined in the LDP. (323) |
| Appendix 3 | All policies (except Policy HD2: Housing in the Countryside) | The contributor supports the approach taken by the Council, with the exception of Policy HD2, have no further comment. (101) |
| Appendix 3 | All policies | Although the contributor does not consider herself qualified to judge – she hopes that the principles of fairness and equality and consideration of impact both positive and negative and what is actually best for current residents are driving the decision making for the need for domestic and industrial development and not the other way round. The process should not be the driving force, people and the environment should. (197) |
| Place Making and Design | Policy PMD1 Sustainability | The contributor supports the retention of this policy. (119) The contributor welcomes the acknowledgement that the planning system should be better integrated with the Land Use Strategy. The contributor is aware that the Council had a Land Use Strategy pilot and wonder about the future plans for this initiative. (199) |
| Place Making and Design | Policy PMD1 Sustainability & Policy PMD2 | The contributor also welcomes and supports the continuation and updating of both of these policies. The contributor welcomes that the comments they made at the Proposed Plan stage have been taken into account, and consider that both these policies alongside Policy EP12 Green Network are important to the |

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| | Quality Standards | <p>major of the policies in the plan.</p> <p>The contributor continues to support the inclusion in Sustainability subsection a) of the standards that require developers to demonstrate appropriate measures have been taken to maximise the efficient use of energy and resources, including the use of renewable energy and resources such as District Heating Schemes. The contributor is happy to continue working with Scottish Borders Council in the drafting of policy wording which reflects the ambitions of the Council and this policy.</p> <p>The contributor notes and welcomes the reference to the production of SG on waste and would welcome the opportunity to assist in the production of this.</p> <p>The contributor also welcomes the reference to Green Infrastructure within section c of the policy. This compliments the policy wording on Green Networks and we note that this policy is considered relevant to most other policies within the Plan. (119)</p> |
| Place Making and Design | Policy PMD2 Quality Standards | <p>The contributor supports the retention of this policy. (119)</p> <p>The contributor understands that this policy requires some update in respect of criteria on energy supply and digital connectivity. In reference to our response to Question 13, the contributor suggests that the policy should include the role of green infrastructure as means of safeguarding access to pipe and cable runs. A policy cross-reference to Policy EP12 may be useful. (213)</p> |
| Place Making and Design | Policy PMD3 Land Use Allocations | <p>The contributor supports the retention of this policy. (119)</p> |
| Place Making and Design | Policy PMD4 Development Outwith Development Boundaries | <p>The contributor requests that Policy PMD4 is amended to remove any reference to SBC's Housing Land Audit. The contributor contends that consideration of any housing land shortfall should be assessed separately, at the time of determination, with the most up to date evidence base. (111, 114)</p> <p>The contributor supports the retention of this policy. (119)</p> <p>The contributor states that the problem is trying to squeeze modern developments, both domestic and industrial, into historic town layouts while balancing this against the need to maintain the individual historic character of each settlement. The existing policy has reached its limits since the developments proposed impose an unacceptable burden on the infrastructure of settlements that served the purposes of past times. (153)</p> <p>The contributor states that consideration must be given to existing availability for development within the Development Boundary and if none exist then sympathetic development could be permitted. Any such development should have zero to minimal negative impact on neighbours; low noise, screening, economic importance to the local community and support from the local community should all be considered when deciding if a development is permitted. (214)</p> |

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| | | <p>The contributor states that development boundaries should not be cast for ever and be used to constrain the communities they surround. They must be flexible to allow development to occur in a measured sustainable manner. (315)</p> <p>The contributor agrees regarding access, regarding introductory text and the discussion of development outwith boundary, it is their view that Policy HD2 should continue to be considered on a case by case basis and that more clarity is required when considering proposals of this nature. (318)</p> |
| Place Making and Design | Policy PMD5 Infill Development | <p>The contributor supports the retention of this policy. (119)</p> <p>The contributor believes that policy PMD5 is insufficiently restrictive and infill development over time changes and undermines the nature of a whole area unless sufficiently controlled. Currently there is very little effective control. (277)</p> |
| Economic Development | Policy ED1 Protection of Business and Industrial Land | <p>SEPA support the retention and modification of this policy. The proposed modifications are detailed within the Question 2 responses table. (119)</p> <p>Not only should this land be protected, encouragement should be given to develop land to support the local economy. The Council is encouraged to create a Business and Industrial Land register to monitor requests to purchase or develop this to ensure it is not being retained for other uses. (214)</p> <p>Selkirk and District Community Council draws attention to the unique development opportunities which will accrue when a Selkirk by-pass is identified and in operation. (305)</p> |
| Economic Development | Policy ED4 Core Activity Areas in Town Centres | <p>The contributor opposes reductions in developer contributions, and as far as Peebles is concerned the reduction of the core activity area. Any policy change should be carefully worded to ensure that any flexibility towards this policy should only be allowed on the basis of evidence provided by applicant and that this evidence must be capable of challenge by officers. (318)</p> |
| Economic Development | Policy ED6 Digital Connectivity | <p>This must be given the highest priority to encourage business to the area. (289)</p> <p>There is a general need and demand for substantial improvement to Wi-Fi – to promote and support modern business. (305)</p> |
| Economic Development | Policy ED7 Business, Tourism and Leisure Development in the Countryside | <p>SEPA seek modification of policy to clarify balance against environmental considerations.</p> <p>Contributor 199 states that they agree that this policy should be cross referenced with the Woodland Strategy in order to encourage farm/business diversification, however, they do not agree with the overly economic focus proposed in the context of Brexit. It is unsustainable and against other policies discussed in this MIR to focus on economic gain at the expense of environmental concerns. Good land stewardship</p> |

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| | | <p>is about balancing the three pillars of sustainability. Indeed, they can take this further and say that the environment underpins social and environmental activity. It seems that the proposed changes to this policy do not take this fact into account. Rural businesses are in particular dependent on natural assets, for example: the tourism and food and drink sectors are dependent on high quality of air, land and water, and should therefore operate in a way which protects natural assets.</p> <p>Contributor 213 states that the reference to cross-referencing to the Woodland Strategy implies that one of the likely diversification measures envisaged would be woodland planting. The contributor states that they support Scottish Government's policy aims for woodland retention and expansion in Scotland. Nevertheless, they consider that careful consideration will be required for this policy topic. Important natural heritage resources such as carbon rich and peat soils would require careful consideration and they recommend that such issues are carefully considered in supporting text and through cross-referencing of relevant policies such as Policy ED10. It seems likely that further diversification and development is likely to be associated with tourism. An example of this can be seen in the emerging proposals for a mountain bike innovation centre in Innerleithen. As there are a number of potential cycling related proposals emerging from the Borderlands Growth Deal it may be useful to review part b) of Policy ED7 with a view to relevant documents such as the Scottish Borders Cycle Tourism Strategy 2016-2021.</p> <p>Contributor 305 states that they endorse the need to consider the implications upon the wider and local economy for whatever BREXIT deal may be approved following current UK/EU negotiations. (119, 199, 213, 305)</p> |
| Economic Development | Policy ED8 Caravan and Camping Sites | <p>Contributor 119 states that they support the principle of the policy and the update in wording.</p> <p>Contributor 213 states that they welcome the proposal that caravan and camping sites should be subject to "high standards of placemaking and design".</p> <p>Contributor 214 states that they agree with the suggestion of changing the title of the Policy to "Holiday Accommodation in the Countryside". Consideration should be given to include references to "Glamping Pods" in the Policy. Size of possible developments compared to the "host" community should be considered when assessing suitability for a development.</p> <p>Contributor 305 states that they draw attention to the need for assessing the potential length of stay in caravans and chalets and to have a clear understanding/differentiation between short term holiday lets and longer almost permanent occupation which require different infrastructural and commercial support. (119, 213, 214, 305)</p> |
| Economic Development | Policy ED9 Renewable | <p>Paragraph 159 of Scottish Planning Policy states that "Local development plans should identify where heat networks, heat storage and energy centres exist or would be appropriate and include policies to</p> |

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| | Energy Developments | <p>support their implementation.” As noted in response to MIR Question 13 and our comment on Policy PMD2, Scottish Planning Policy also emphasises the importance of safeguarding piperuns for later connection. As green infrastructure can play a role in such safeguard areas we recommend that update of Policy ED9 should include a cross-reference to Policy EP12 (213)</p> <p>Support for district heating schemes is to be welcomed (315)</p> <p>We believe that the LDP2 policies should also include, in light of the above Scottish Government position, a clear focus on the further development of renewable technologies, including onshore wind, with a focus on repowering, and any such associated proposal which achieves the optimisation of a renewable site, such as colocation of compatible technologies, the move towards the use of taller turbine technology, and include support for any other associated development which supports the reconfiguration of our energy system with view to achieving a low carbon future. Policy support for new and repowered onshore wind, in addition to solar and energy storage is essential if the Scottish Government’s low carbon economy objectives, and the targets set out in the Scottish Energy Strategy are to be realised (99)</p> <p>SEPA support the principle of the retention of the policy. We will require that further specific information is included in the text of Policy ED9 which supports the construction of low carbon energy distribution, district heating networks. Alternatively it may be preferable to draft a new policy the forthcoming plan which specifically outlines the Council’s support and information requirements for district heating proposals. We acknowledge that there is support for low carbon energy networks within the background text to the policy, however in order to anchor the policy commitment for such networks, support for such proposals needs to be covered in the text itself.</p> <p>We require this policy (as an insertion to Policy ED9 or new policy) to outline a requirement for substantial new development, such as a new town or sizeable development to connect to an existing or proposed district heating network, or provide a heat network within the site. We also require text within the policy format of LDP2 which identifies that new developments located adjacent to existing or proposed new heat networks or heat supplies should be designed to be capable of connecting to the heat supply. This could include incorporating space to be safeguarded for future pipework/piperuns within developments, incorporating grass/green corridors along footpaths or roads which could be excavated for installing heat network pipes without significant disturbance, and ensuring the new infrastructure does not obstruct the development of planned heat network and district heating systems. It is acknowledged that due to the scale, form and type of development within the Scottish Borders area, that developments of this scale which would be considered to be “substantial”, may not occur regularly. Substantial developments may consist of new towns, urban extensions, large regeneration areas or large development sites subject to master planning. There is, however, an element of judgment that will need to be applied by the Council and it might be that some sites offer significant potential for heat networks due their location, support from</p> |
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| | <p>the local authority and ‘buy in’ from developers. In order to meet the energy efficiency requirements and targets set by the Scottish Government, as outlined in paragraph 1.2, renewable energy generated needs to be used by new developments. Where substantial new developments are planned, the opportunity arises for providing a heat network within the site and for this to be required and designed in at the earliest stages. New developments have a role to play in not only establishing and creating these networks, but also in connecting to networks to make use of heat that is being captured. Furthermore, paragraph 154 of SPP states that the planning system should support the transformational change to a low carbon economy consistent with national objectives and targets including deriving 11 % of non-electrical heat demand from renewable sources by 2020. Paragraph 159 of SPP goes on to advocate that Local Development Plans should support the development of heat networks in as many locations as possible even where these may be initially reliant on carbon-based fuels if there is potential to convert them to low carbon fuels in the future. Maximising the use of existing waste heat sources should always be explored and heat mapping used to co-locate developments with a high heat demand with sources of heat supply (paragraph 158). Paragraph 159 of SPP also states that LDPs should specifically identify appropriate locations for the development of heat networks/storage/energy centres and include heat policies that support the implementation of this approach (119)</p> <p>We consider policy ED9 to be weak. The SPG refers almost entirely to large scale windfarm developments, and therefore has little to say about potential smaller scale projects which could make a significant impact on local generation and on community resilience. The policy should be promoting opportunities for range of smaller scale renewable energy generation projects (196)</p> <p>SSE requests that a clearer policy relating to the wind energy development – including repowering and extension - is established in the Proposed Plan and request that changes are made to the MIR to better support future investment in renewable wind energy developments. This can be achieved by:</p> <ul style="list-style-type: none"> - The provision of a greater emphasis on an evidence based and site specific approach to future wind farm development, instead of a reliance on capacity studies. - Specific reference to support for repowering existing windfarm locations such as the Toddleburn and Clyde Wind Farms. - Identifying existing windfarm locations on LDP proposals map. - Including reference to the acceptance of windfarm developments. - The provision for and policy support for offshore grid connections, including grid cabling, associated substations and ancillary equipment. <p>SSE welcome that the Council will continue to support proposals for major wind farms within appropriate locations. Paragraph 7.4 states that SESPlan requires LDPs to identify opportunities for repowering of existing wind farm sites.</p> |
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| | | <p>SSE is firmly of the view that wind energy will continue to contribute significantly towards efforts to reduce carbon emissions and help tackle climate change. SSE does not consider it appropriate for the Council's SG on Renewable Energy and the Ironside Farrar Landscape Capacity Study and Cumulative Impact Study 2016 to be used as a policy basis in decision making for wind energy developments, and instead would prefer to see a focus throughout the emerging LDP on the acceptability of development based on the individual planning merits of the proposed development.</p> <p>Furthermore, an evidence based and site specific approach should be taken to further support wind energy developments rather than a reliance on Landscape Capacity Studies. Consideration should be given not just to Landscape Capacity Studies but also the information contained within an Environmental Impact Assessment Report and supporting planning documentation. (322)</p> |
| Economic Development | Policy ED10 Protection of Agricultural Land and Carbon Rich Soils | <p>SEPA support the retention of this policy. We continue welcome the policy requirement for a soil (or peat) survey to demonstrate that the areas of highest quality soil or deepest peat have been avoided. We also welcome the requirement for the provision of a soil or peat management plan in order to demonstrate that any unnecessary disturbance, degradation or erosion has been minimised, which includes proposed mitigation measures. This is particularly important for developments on peat, as bad management practices can disturb peat leading to oxidation and drying, and the unnecessary release of carbon dioxide. The Development Plan Guidance Notes (Soils) referenced at the beginning of the document also contains a number of references and guidance which we would recommend signposting to as part of the policy text to ensure it remains up to date as possible prior to publication and adoption (119)</p> <p>A general comment, the allocation of some sites in the Peebles area seems to fly in the face of this policy which is to be retained (318)</p> |
| Economic Development | Policy ED11 Safeguarding of Mineral Deposits | SEPA support the retention of this policy (119) |
| Economic Development | Policy ED12 Mineral and Coal Extraction | <p>SEPA support the retention of this policy (119)</p> <p>We welcome the proposal to amend the policy wording for sensitive receptors. As the policy does not currently include a peat specific criterion, we suggest that this forms part of the amendment, for example, "There will be a presumption against peat extraction and other development likely to have an adverse effect on peatland and/ or carbon rich soils within Class 1 and Class 2 peatland areas." (213)</p> |
| Housing Development | Policy HD1 Affordable and Special Needs Housing | <p>The contributor stresses the need to include affordable and special needs housing in the programme. However, it is essential that these are located 'geographically' in locations where local infrastructure such as public transport and access to community facilities are easily accessible. (305)</p> |

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| | | The contributor states that this policy requires review to make clear that there is an expectation that the contribution to affordable/special needs housing will amount to 25%. This will only be varied under exceptional circumstances where robust evidence to support any claim will be provided. Such evidence must be capable of verification and challenge by Officers. (318) |
| Housing Development | Policy HD1 Affordable and Special Needs Housing & Policy HD2 Housing in the Countryside | The contributor raises concerns that these current policies do little to facilitate the construction of single units in small rural communities where there is local need. Such single unit development is considered to be too expensive, but the potential benefits of such units are significant. Policy should be to facilitate such development where possible. (196) |
| Housing Development | Policy HD2 Housing in the Countryside | <p>The contributor states that they do not agree with the preferred option outlined for the housing in the countryside policy. (195)</p> <p>The contributor does not support the preferred option for housing in the countryside but supports the alternative proposal. (315)</p> <p>SEPA advise that they support the retention of this policy. (119)</p> <p>SNH advise that they have no settled view on this matter. They would be supportive of a policy which supports the delivery of well sited and appropriately designed rural housing. They would be happy to provide further advice on this matter. (213)</p> <p>It is the contributor's view that Policy HD2 should continue to be considered on a case by case basis and that more clarity is required when considering proposals of this nature. (318)</p> |
| Housing Development | Policy HD3 Protection of Residential Amenity | <p>The contributor supports the expansion of this policy. (119)</p> <p>The contributor states that the MIR suggests that this policy will be amended to show that it refers to renewable energy developments; provided that these issues are <u>in addition</u> to the other criteria listed in para.1.1 of the policy, this is acceptable. If not, and these issues are exclusively related to this policy this is not acceptable. (318)</p> |
| Housing Development | Policy HD4 Meeting the Housing Land Requirement/ Further Housing | The contributor states that the Report of Examination for SESplan 2 has recommended significant modifications that alter the policy framework of Proposed SESplan 2. The MIR is based on Proposed SESplan 2. Until such time as the SESplan 2 is approved by the Scottish Ministers, the statutory policy framework for the LDP 2 is not known. (311) |

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| | Land Safeguarding | SEPA advise that they support the retention and minor amendments to this policy. (119) |
| Housing Development | Policy HD5 Care and Retirement Homes | Contributor 119 states that they support the retention of this policy. Contributor 289 states that given the expected population changes and in particular age stratification there should be very clear policies in place to support controlled development and consideration of the most appropriate provision method i.e. public or private sector. (119, 289) |
| Environmental Promotion and Protection | Policy EP3 Local Biodiversity | The contributor welcomes the inclusions in this policy and states that it makes perfect sense to use the Council's LBAP as Supplementary Guidance to this policy. Biodiversity net gain could be a welcome addition however, it depends on the policy provisions and how these would be implemented. The contributor has concerns in relation to biodiversity net gain and ancient woodland protection for the following reasons: ancient woodland is irreplaceable and therefore removal of this habitat and like for like replacement cannot be applied in this case. Similarly, there are other irreplaceable habitats which should be excluded from net gain calculations, because if they are destroyed or damaged it cannot be claimed that the development has resulted in net gain. (199) |
| Environmental Promotion and Protection | Policy EP4 National Scenic Areas | The contributor believes that NSA designations could be delivering much more for the Borders economy. Current policy appears to be to pretend they are not there. (196) |
| Environmental Promotion and Protection | Policy EP6 Countryside Around Towns | The contributor reminds SBC that Selkirk Hill is an important Common good asset and should be formally recognised as being an integral part of the Selkirk community. (305) |
| Environmental Promotion and Protection | Policy EP7 Listed Buildings | Contributor 10 notes that whilst they support efforts to capitalise on the Listed Building assets, the Council should take into consideration that it is not always possible to maintain a listed building, restore it or redevelop it. Damage and other factors can create a situation whereby a listed building can create a situation whereby a listed building can make a site undevelopable and unviable. The contributor therefore seeks that the Policy EP7 is amended to take account of those rare occasions where demolition of a Listed Building is required in order to facilitate and ensure the future of an area. (10) |
| Environmental Promotion and Protection | Policy EP9 Conservation Areas | Contributor 318 states that rather than increase the emphasis on the need for a design statement, the policy should instruct that a design statement is required when considering conservation areas. Further, it should be made very clear that with regard to sites that have a boundary contiguous with a conservation area, this policy applies. (318) |
| Environmental Promotion and Protection | Policy EP10 Gardens and Designed | Contributor 213 states that the policy reference to be made to the Peter McGowan Consultants study on Gardens and Designed Landscapes is unclear at this stage. They understand that it would not be firmed up until the Proposed Plan is drafted but suggest that reference to Annex 3 would be particularly useful in |

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| | Landscapes | <p>a policy context. Annex 3 provides guidance on management and restoration of these sites with part 4 of the Annex setting out design principles and common issues that they consider would provide essential direction for any planning application within or adjacent to a garden and designed landscape.</p> <p>The contributor also advise that clear differentiation should be provided in the policy between the relative importance of sites that are on the National Inventory of Designed Landscapes in Scotland and those identified by the Peter McGowan study. (213)</p> |
| Environmental Promotion and Protection | Policy EP11 Protection of Greenspace | <p>Contributor 254 states that they support the retention of policy EP11 Protection of Greenspace. This policy seeks to safeguard and improve green spaces including outdoor sports facilities as well as less formalised places that also provide opportunities to participate in sport and recreation. (254)</p> |
| Environmental Promotion and Protection | Policy EP12 Green Networks | <p>Contributor 119 states that they continue to support the inclusion of this policy, specifically welcoming that the water environment is included as part of green network. This will help to contribute to the delivery of the River Basin Management Plan (RBMP) and Flood Risk Management Plan (FRMP) objectives of the Council. They also state that they welcome that paragraph 1.4 refers to the improvement of the quality of the water environment. The contributor also welcomes the cross reference to policy PMD2 Quality Standards.</p> <p>Contributor 254 states that they support the retention of policy EP12 Green Networks. This policy seeks to safeguard and improve green spaces including outdoor sports facilities as well as less formalised places that also provide opportunities to participate in sport and recreation.</p> <p>Contributor 288 states that they request consideration is given to the development of the railway from St Boswells to Berwick upon Tweed. (119, 254, 288)</p> |
| Environmental Promotion and Protection | Policy EP13 Trees, Woodlands and Hedgerows | <p>The contributor requests the regular monitoring of air quality and pollution levels in Selkirk town centre - and in other towns where traffic levels are high. (305)</p> <p>The contributor would like to see the wording 'Removal or damage to woodlands present on the Ancient Woodland Inventory, or woodland of high nature conservation value will not be permitted' included within this policy. They consider that any woodland included in SNH's Ancient Woodland Inventory, which is present on historical maps or which exhibits significant numbers of ancient woodland indicators can be considered as ancient and is therefore worthy of further study and is likely to pose a constraint on development. They believe that ancient woodland is amongst the most precious and bio-diverse habitats in the UK and is a finite resource which should be protected. (199)</p> <p>The contributor is aware that in the Borders the AWI is not comprehensive and arguably it is the area with most gaps in the data. This is why in their site assessments they suggest that tree surveys should be undertaken for certain areas, where they see where is woodland on digital maps, but this is not present on</p> |

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| | | the AWI. They would also like to see a provision for the buffering and extension of ancient woodland sites through targeted woodland and habitat creation, which have greatest potential to be placed on a sustainable footing, and would be best for wildlife. They welcome that this is listed as a site specific requirement in some instances, however, for future developments, and planning applications out-with the development plan, such a requirement should be listed in this policy as a material consideration. This policy should also contain wording on appropriate native tree planting, in instances where replacement planting is required, with trees sourced and grown in the UK to ensure lower biosecurity risk. (199) |
| Environmental Promotion and Protection | Policy EP14 Coastline | The contributor states that in the future, Local Authorities and the Marine Planning Partnerships (MPP) should work together to ensure planning coherence across the land-sea interface. It is important that this extends beyond the jurisdictional overlap of the intertidal zone, as activities far inland can have implications for marine health and all human activities have a connection to and therefore an influence on land. Prior to the establishment of the Forth & Tay Marine Planning Partnership, Scottish Borders Council should work to ensure coherence with the National Marine Plan (NMP). The NMP is a statutory plan with policies relevant to all public authorities, including those whose responsibilities are primarily land-based. Policy GEN 15 of the NMP (Planning alignment A) is of particular relevance to local authorities. The contributor suggests that Policy EP14 should be reviewed and updated to ensure the required complementary policies and practices are in place. This would be in accordance with Circular 1/2015: The Relationship Between the Statutory Land Use Planning System and Marine Planning and Licensing. (213) |
| Environmental Promotion and Protection | Policy EP15 Development Affecting the Water Environment | The contributor supports the inclusion of this policy. The contributor welcomes the retention of this policy as it provides good coverage of the 'protection and improvement' objective of Water Framework Directive (WFD). The first line of the policy stating that the Council will support development proposals which seek to bring an improvement to the quality of the water environment. (119) |
| Environmental Promotion and Protection | Policy EP16 Air Quality | The contributor supports the inclusion of this policy. It should ensure that new developments do not have an adverse impact on air quality either through exacerbation of existing air quality problems or the introduction of new sources of pollution where they would impact on sensitive receptors. We welcome the requirement for Air Quality Assessments in cases where the Council considers that air quality may be affected by development proposals. The contributor also states the successful implication of this policy will be reliant on development management officers being able to identify when an air quality assessment is required. Relevant developments are likely to be those that involve emissions to air (e.g. biomass or EfW applications) or lead to increased traffic on specific routes. It is important to note that, when considered in isolation, a single development is unlikely to have a significant impact on local air quality and may not trigger the need for an Air Quality Assessment. However, when it is considered alongside other developments in and around the area that may also increase traffic, the cumulative impact on some routes is likely to be more significant and could result in a breach of an air quality standard. (119) The contributor considers it very odd that so little is said about encouraging renewable energy - and yet |

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| | | <p>the potential negative impact of wood-burning stoves is flagged-up! The text must not, as suggested, blame "low carbon/renewables" as having a detrimental impact - the issue is the supply of damp logs. This could be addressed by licencing woodfuel suppliers to make sure only dry logs are supplied or by raising awareness of the problems caused by damp logs. (196)</p> <p>The contributor states there is mention of detrimental impact of Air quality in policy EP16 using low carbon fuels/renewables, which is difficult to avoid in rural setting - perhaps add also the air quality control surrounding animal and poultry operations i.e. slurry lagoons and spreading. (215)</p> |
| Infrastructure and Standards | Policy IS1 Public Infrastructure and Local Service Provision | <p>The contributor considers a serious review is required of infrastructure policy and the impact of new housing on schools, doctors and transport infrastructure. If it can be deemed this policy is adequate then clearly the Council is not following it. (147)</p> <p>SEPA support the retention of this policy. (119)</p> |
| Infrastructure and Standards | Policy IS2 Developer Contributions | <p>The contributor comments on the requirement for a vehicular link over the Eddleston Water between Rosetta Road and the A703 (The Dalatho Street Bridge). They state that there are no traffic impact reasons that justify the need for the Dalatho Street Bridge. All traffic surveys undertaken by highways engineers SWECO, from 2010 until today, have demonstrated that there is no significant impact from the enhanced mixed use development that require the Dalatho Street Bridge to be delivered. A recent traffic survey, undertaken by SWECO, over a normal working/school week, further demonstrates that traffic in Peebles has not increased at the rate that was initially forecast. This further emphasises the fact that the Dalatho Street Bridge is not essential, either as a result of development at Rosetta or in terms of current traffic movements in Peebles generally. They state that the Dalatho Street Bridge is not required. (126)</p> <p>Should SBC still consider this need, the contributor requests that the test of the current policy is updated to include a requirement for any new residential development within or adjacent to the Peebles boundary to contribute £1000 per dwelling for both the new River Tweed Bridge and the Dalatho Street Bridge. This will enable sharing of the cost with other developers/landowners to help improve the wider road infrastructure of Peebles for the long term. (126)</p> <p>SEPA advise that they support the inclusion of this policy. They support the continuation of this policy and welcome that contributions could be sought for the protection/enhancement of environmental assets (which would include the water environment), foul and surface water drainage and the provision of facilities to collect, store and recycle waste. (119)</p> |
| Infrastructure and Standards | Policy IS2 Developer Contributions | <p>The contributor states that they support the approach taken by Policy IS3 of the adopted Local Development Plan and is pleased to see that it is proposed to be substantially retained in the Main Issues Report. Likewise, the contributor supports the continued usage of Policy IS2 which recognises at part c)</p> |

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| | and IS3 Developer Contributions Related to the Borders Railway | that subsidy to public transport provides a valuable form of contribution. (294) |
| Infrastructure and Standards | Policy IS4 Transport Development and Infrastructure | <p>Selkirk and District Community Council draws attention to the need for a Selkirk by-pass and the local and wider support which has been given to the proposal – in particular via the A7 Action Group and local canvassing results. (305)</p> <p>Network Rail note that the newly completed Border Railway (connecting Edinburgh with Stow, Galashiels and Tweedbank) has brought real and apparent benefits to the Scottish Borders area in terms of new development, regeneration, tourism and business opportunities within the area as recognised by both the Council (see paragraph 2.11 of the MIR) and within SESPlan (see paragraph 2.21 of MIR). It is noted at paragraph 2.11 that the Council supports and is promoting a new station at Reston as well as the potential extension of the Borders Railway line to Hawick and possibly on to Carlisle beyond. The Scotland Route Study does not identify either of these projects as contenders for funding, however it should be noted that the route study specifically excluded the potential opening of new lines or new stations as it ...”would be inappropriate for a rail industry process to assume that the solution to a local transport need is either a new/re-opened railway station to a new/re-opened railway line.” The Scotland Route Study comments that there will be the opportunity for promoters and stakeholders to work with the Scottish Government and the rail industry to develop options. To this end, Network Rail has been working closely with Scottish Borders Council in respect of a new station at Reston and this will be progressed in line with Scottish Government aspirations in Control Period 6. Network Rail is not currently tasked to work on the extension of the railway beyond its current terminus in Tweedbank. (294)</p> |
| Infrastructure and Standards | Policy IS8 Flooding | <p>The Flood and Coastal Erosion Risk Management Team of Northumberland County Council ask that particular attention is paid to those areas that are within the River Tweed catchment and note that they should be consulted on flood alleviation schemes and large development in areas close to the River Tweed and border towns. (100)</p> <p>SEPA welcomes the framework provided by this policy, and are pleased to note that the policy is strengthened by the inclusion of an overarching statement that promotes the avoidance of flood risk. This precautionary approach is supported by SPP and the Flood Risk Management (Scotland) Act 2009. SEPA had previously requested that Policy IS8 be modified to state clearly that development on the functional flood plain should be avoided and they acknowledge that the policy does state that development should be located away from them. SEPA is also pleased to note that the policy includes a statement about avoidance of flood risk as a first principle. They reiterate their recommendation that paragraph one is</p> |

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| | <p>amended to clarify what is meant by <i>significant</i> flood risk (they note that the second paragraph highlights the 0.5% probability, but they consider that this should be explained in the first paragraph). In accordance with the risk framework in Scottish Planning Policy this should include flooding up to and including a 1 in 200 year flood event. The contributor also requires that the wording under Policy IS8 a) is modified from “essential civil infrastructure” to “civil infrastructure” and the development described such as hospitals, fire stations, schools and care homes, be separated from the development described as ground-based electrical and telecommunications equipment which is “essential infrastructure.” Essential infrastructure can be located in areas where the flood risk is greater than 0.5% annual probability, however civil infrastructure will never be acceptable in these locations. SEPA states that they are happy to discuss future wording for the policy to ensure that this is clear and they refer the Council to their Land Use Vulnerability Guidance which sets out a framework to assist the assessment of vulnerability of different types of land use to the impact of flooding. This is based on the risk framework in SPP and classifies the relative vulnerability of land uses into five groups from most vulnerable uses to water compatible uses. This could be included to ensure that flood risk vulnerability of the proposed land use is appropriate for the location and degree of flood risk to the site. For example, in flood risk areas less vulnerable land uses such as commercial or industrial should be favoured over residential use (especially on the ground floor). This approach is supported by the Scottish Government and is a principle promoted in the Flood Risk Management Act 2009 in relation to reducing overall flood risk (duties placed on local authorities in Section 1 of the Act). SEPA requires that the policy identifies that a precautionary approach should be taken to proposed allocations in areas protected by a formal flood protection scheme. The categories of development allocation would generally be acceptable when protected by an existing or planned formal flood protection scheme within a built up area are outlined in their Development Plan Flood Risk Guidance. It is recommended that any allocated site protected by a formal scheme is built to a water resilient design and has adequate evacuation procedures in place that are appropriate to the level of risk and use. This is a matter for solely the Council. SEPA states that they are happy to discuss policy wording with the Council in advance of the Proposed Plan. They also recommend that the role of sustainable flood risk management should be recognised in the context of sustainable placemaking and blue/green infrastructure as part of the policy text. This includes the policy framework for sustainable placemaking and blue/ green infrastructure and the identification of existing and creation of new blue/green infrastructure in the spatial strategy. These comments should also be read in conjunction with their comments in Policy ED1 Protection of Business and Industrial Land with regard to the comments SEPA made regarding consideration of complementary uses. They would also add for awareness that SEPA will shortly be publishing updated guidance on “Climate Change allowances for flood risk assessment in land use planning”, which will supersede all current guidance on climate change and land use planning. They are currently processing outputs from UKCP18 to provide a table of regional sea level rise allowances up to 2100 and they expect to have this finished to be incorporated into the guidance in Spring 2019. Further work is required to translate the UKCP18 projections for rainfall and temperature into climate change</p> |
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| | | <p>allowances for river flows. Together with the Environment Agency they have commissioned CEH to produce new projections for flood flows for catchments larger than 100 km² using the UKCP18 projections. These will be available in mid-2019. Until then recommended climate change allowances for river flow will be based on the regional uplifts from the 2011 study by CEH, “An assessment of the vulnerability of Scotland’s river catchments and coasts to the impacts of climate change”, which is available from our website. The current outputs from UKCP18 do not provide projections for short duration heavy rainfall which can cause surface water flooding and flooding in flashy catchments. It is anticipated that these will be released by the UKCP18 project in mid-2019. Additional research is likely to be required to translate these into guidance. In the meantime, the most up-to-date projections for short duration high intensity rainfall are those from the 2017 UK Water Industry Research Project, “Rainfall Intensity for Sewer Design, Phase 2”. (119)</p> <p>The contributor considers that no development should take place on flood plains or anywhere that would require the modification or realignment of water courses or the provision of flood defences, or involve the destruction of any wetland habitat or feature (e.g., marsh, bog, wet grassland). Historically, the Borders has seen extensive commercial and domestic development on riversides, a response to the need for water power for the mills. This has left a legacy of unsustainable and expensive measures required to keep these premises and properties protected from flooding. There is no justification for such an approach nowadays. Rather than continuing to build in flood-prone areas, and defending these at unacceptable financial and ecological cost, managed retreat of settlements and infrastructure should be embarked upon to address maladaptive development along watercourses. Such an approach will contribute hugely to flood management and remove the need for expensive flood-protection measures. If SEPA objects to developments (such as that at Eildon, Selkirk) there should be no attempt by the Council to progress the proposal. Flood risk can be avoided in new developments by the simple expedient of not building in flood-prone areas. The presence of existing buildings in such areas, or flood prevention defences/structures, should not alter this approach. (182)</p> |
| Infrastructure and Standards | Policy IS9 Waste Water Treatment Standards and Sustainable Urban Drainage | <p>The contributor states that they support the retention of this policy and the intention to expand it to include reference to the forthcoming Supplementary Guidance on SUDS. They recommend that the policy background text is also expanded to acknowledge and support multiple benefits that are delivered as a result of improvements to the ground water environment through SUDS such as the development of green/blue infrastructure and contributions which can be made to sustainable placemaking. They also recommend that within the policy background text that reference is made to the requirement for Controlled Activities Regulations (CAR) construction site licences for the management of surface water run-off from a construction sites, including access tracks, which are:</p> <ul style="list-style-type: none"> • is more than 4 hectares, • is in excess of 5km, or |

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| | | <ul style="list-style-type: none"> includes an area of more than 1 hectare or length of more than 500m on ground with a slope in excess of 25° <p>The contributor states that SEPA's Sector Specific Guidance: Construction Sites (WAT-SG-75) provides further specific details. They would also advise that site design can be affected by pollution prevention requirements and therefore they strongly encourage pre-CAR application engagement discussions with the SEPA regulatory teams. (119)</p> |
| Infrastructure and Standards | Policy IS10 Waste Management Facilities | <p>The contributor supports the retention of this policy. (119)</p> <p>The SBC recycling policy is woefully inadequate as most plastics are single use. This requires joined up work with manufacturers. (223)</p> |
| Infrastructure and Standards | Policy IS11 Hazardous Developments | The contributor supports the retention of this policy. (119) |
| Infrastructure and Standards | Policy IS13 Contaminated Land | <p>The contributor notes that the reference to unstable land within this policy is under review as it is not considered relevant to contamination issues. Although the contributor would not dispute that the title of the policy refers specifically to contaminated land they do consider that it is important to ensure that issues of unstable land are addressed within the Local Plan. Within the existing Local Plan paragraph 1.6 of the supporting text for Policy IS13 states that 'the policy covers development on unstable land arising from mining activities which affects a part of the Borders'.</p> <p>The contributor recommends that reference to unstable land is retained within this policy in order to ensure that in those areas affected by past coal mining activity the risks posed to surface stability are clearly identified and remediated where necessary. The contributor suggests that the policy wording be amended as follows:</p> <p><u>Policy IS13: Contaminated and Unstable Land</u> Where development is proposed on land that is contaminated, suspected of contamination, or unstable the developer will be required to:</p> <ol style="list-style-type: none"> carry out, in full consultation with, and to the satisfaction of Scottish Borders Council, appropriate phased site investigations and risk assessments; and where necessary, and to the satisfaction of Scottish Borders Council design, implement, and validate appropriate remedial or mitigation measures to render the site suitable for its proposed use. (79) <p>The contributor is generally content with the current wording of the final sentence of paragraph 1.1. However, the contributor thinks it may be useful to provide a reference to their checklist on 'How and when</p> |

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| | | <p>to consult Scottish Natural Heritage’ as the situations in which they would wish to be consulted do extend beyond designated sites in some instances. The contributor’s checklist is available here: https://www.nature.scot/professional-advice/planning-and-development/consulting-snh-planning-and-development (213)</p> |
| New Policies | Cemeteries | <p>Contributor 119 states that they support the replacement of cemetery allocations with a policy based approach, with the intentions of protecting existing cemetery sites and the application of criteria for new sites or expansions. The contributor states that they strongly recommend that the Council engages with SEPA with regard to the proposed wording, particularly with regard to the criteria to ensure that the proposed policy complies with current regulatory standards and future developments do not have any detrimental impacts on the water environment. They also recommend that the Council reviews SEPA’s current Guidance on Assessing the Impacts of Cemeteries on Groundwater with regard to cemetery proposals to ensure the proposed policy draft is cognisant of the application requirements for such developments.</p> <p>Contributor 213 states that the introduction of a policy-based approach to cemeteries offers an opportunity to develop an approach that is place-based and which integrates these into the wider green network. While the primary role of cemeteries is commemoration of loved ones, the contributor welcomes a policy that acknowledges their wider role as important green spaces for towns and villages. The policy should also encourage proposals for new cemeteries or extensions to existing cemeteries to design in natural features that are beneficial to visitors for their aesthetic properties and to biodiversity for their role in wider green networks. (119, 213)</p> |
| New Policies | Dark Skies | <p>Lilliesleaf, Ashkirk and Midlem Community Council support this proposed policy. If necessary, lighting can be suitably directional which can result in minimal light pollution (for example, the Ravenswood roundabout at the A68/Melrose bypass). (93)</p> <p>Support the promotion of “Dark Skies” within the Scottish Borders and submit there is full justification for carrying out further investigation for the preparation, and adoption, of a “Dark Skies” policy (116)</p> <p>There is a need for a new policy to maintain the best of all the historic town cores but to develop for the future outwith these restricted spaces (153)</p> <p>The potential for this initiative is endorsed and consideration of a wider (geographical) policy is encouraged – perhaps also including the area south of Selkirk, which is more central. Regrettably, the Scottish Borders has no official ‘Dark Skies’ location. This is without reason – and a great opportunity therefore exists! (305)</p> |

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| | | <p>Dark(er) skies are a reasonable idea, worthy of further investigation, but has been used as an excuse not to provide illumination in places (eg a 'black hole' in The Green at the centre of Peebles). A more sensible idea is to consider whether in residential areas lights could be dimmed after midnight. Dimmer switches are now cheap but an alternative is to have two smaller bulbs, one of which is switched off after midnight. (96)</p> <p>There are a range of approaches to policy for protecting and promoting dark sky areas. One of these is the designation of a Dark Sky Park, as in Dumfries & Galloway at Galloway Forest Park which has also been given Dark Sky Park status. The other approach is to promote an area as a Dark Sky Discovery Site, which there are several of throughout Scotland. The proposal to adjoin the potential Dark Sky policy area to Kielder, which is already part of a Dark Sky Park, suggests that policy in LDP2 should seek to support existing approaches in policy for the Dark Sky Park. We are aware that in other areas, such as Dumfries and Galloway, the policy in the LDP is relatively short, with detail on lighting requirements for development proposals set out in Supplementary Guidance. We support the principle of a dark skies policy and would be happy to provide further advice as the Proposed Plan is developed. (213)</p> <p>There should be a Dark Skies planning policy which stipulates that lights placed for outside illumination, such as farm yards or horse paddocks or security lights, must be "Dark Skies friendly". (287)</p> <p>New policy provision will be included in the new development plan which is welcomed. This will relate to lighting for new builds within the designated zone once this is established. Initial thoughts for the catchment are the forest adjoining Kielder, which is already dark sky, and as much of the catchment spreading north, south and east as is practical; predominantly land used for forestry and farming. NDCC supports the Newcastleton Business Forum (NBF) and the Newcastleton community Development Trust (NDCT) in their ambitions to develop this to enhance local trade during the off season when the dark sky market peaks and believes Dark Sky status will have wider benefit to other local communities. Newcastleton & District Community Trust (membership 300) undertook a large community consultation during summer 2018 covering a wide range of issues to help devise the next phase of our community development plan; 63 attended focus groups, 80+ attended the feedback sessions and 216 useable questionnaires representing 305 individuals were returned. This participation meant well over 1/3rd of the population participated in the study, a huge response. Amongst new project/development proposals they were asked to comment on Dark Sky</p> <ul style="list-style-type: none"> • We want to see more done to ensure that our community and surrounds are protected and awarded Dark Sky status. • This will give Newcastleton a competitive advantage and attract visitors to see our amazing skies at night, particularly during the traditional off-season from Nov-Mar, benefiting local businesses and securing jobs. |
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| | | <ul style="list-style-type: none"> Experts will determine exactly where the boundary of Dark Sky would extend, based on current light values, and if necessary, implement a light pollution strategy to be adopted within a geographic boundary. This is likely to receive grant funding because of the economic benefits to our community and the wider area. <p>The survey concluded 98% of those who voted supported the Dark Sky status. (307)</p> |
| General | Land Use Strategy | There are markers for LUS but the contributor is still concerned about the ability to genuinely appraise quality of place and quality of life at a settlement level. (236) |

QUESTION 19

Are there any other main issues which you feel should be addressed within LDP2? Please confirm these and explain how these could be addressed.

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Are there any other main issues which you feel should be addressed within LDP2? Please confirm these and explain how these could be addressed.

| Main Issue | Sub Issue | Summary of Main Issues Raised |
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| Any other comments: Question 19 | Aggregated view of the Scottish Borders | The contributor states that the report does not provide an aggregated view of what it means for the Scottish Borders. Rather, it seems to be built bottom up. Choices should be driven not by developers but by the people that live and work in the Borders. (277) |
| Any other comments: Question 19 | Benefits the plan should bring | The contributor considers that the main issue for the Borders is not the number of houses but the dismally low value added per capita. Issues that are critical but are only referred to in general and without much detail include upgrading roads, better broadband, and 5G mobile networks although the contributor states that they rarely see 4G. (96) |
| Any other comments: Question 19 | Borderlands | The contributor states that investigation into working with other authorities to bring the development of a 'Borderland' route along the line of the 'route 500' in the north of Scotland. This would help increase the profile of the whole area and drive revenue to towns and tourism business. (315) |
| Any other comments: Question 19 | Brownfield before countryside locations | The contributor states that brown field sites, such as March Street Mills in Peebles and Former Council Yard in Galashiels, should be developed before building in the countryside. (23) The LDP favours developing on greenfield and agricultural sites rather than brownfield. Brownfield should always be prioritised. (80) |
| Any other comments: Question 19 | Campaign for Borders Rail | The contributor states that when the current LDP was being prepared, the Campaign for Borders Rail argued that the LDP should give proper effect to the SDP policy and the Council's own policy of extending the Borders Railway to Hawick and Carlisle, by including policies to prevent development which could undermine or run counter to that policy, for example by creating a physical obstruction to the route of the railway. In particular CBR argued that extension of the rail route should be highlighted in the settlement maps, in order that any prospective developer would be aware of the presumption against developments which might hinder the railway extension. These representations by CBR were not accepted, but they are reiterated again here for further consideration. In particular, and notwithstanding the fact that the eventual route of the railway extension has yet to be decided, it is submitted that the LDP2 and all settlement maps should stress that no development will be permitted which would obstruct or be located unduly close to the line of the former railway from Tweedbank to Carlisle, as in most cases it is probable that this route will be used for the railway extension. (45) |
| Any other comments: Question 19 | Car Parking | Contributor 93 states there should be a time-limited parking (say 2 hours) in town centres to allow shoppers to visit a town and then depart. All-day free parking is disastrous because there is no parking available for those who want to shop and then leave. |

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| | | <p>Contributor 288 states that the provision of additional car parking should be a planning consideration and areas for future public car parks should be identified within the LDP. Adequate car parking needs to be included in any proposed housing development. Additional public car parking convenient to the Core Activity Area is required.</p> <p>Contributor 289 states that in a bid to support town centre regeneration there should be a clear policy regarding both the provision and enforcement of car parking.</p> <p>Contributor 318 asks where will the additional cars from an increase in housing development park? Car parking in Peebles is already at capacity, with little likelihood of increasing that capacity the issue of parking is critical now. (93, 288, 289, 318)</p> |
| Any other comments: Question 19 | Common Good Land | <p>Selkirk and District Community Council is of the view that an opportunity appears to exist for an assessment to investigate the viability of certain areas of common good land to be used towards an investment which could provide a regular, more productive financial return for community benefit.</p> <p>For example,</p> <ul style="list-style-type: none"> • land could be set aside for the implementation of solar panel field arrays which could bring in a regular income to the immediate local community • (subject to public consultation) any parcels of land which are not being currently used in an optimum or economically viable manner, might be considered for development and provide a capital receipt which could help fund projects to help the local community. (305) |
| Any other comments: Question 19 | Community Empowerment Act 2015 | <p>Contributor 305 states that they support the principle of involving communities in regional decision making but encourages SBC to fully appreciate (and articulate) the nuts and bolts of how this can be carried out whereby local communities can feel involved and empowered. SBC should encourage and make it easier for representatives of local groups (other than CC's) to take part in the decision-making process.</p> <p>Contributor 307 states that they fully endorse the community empowerment act legislated in 2015 and are actively seeking ways we can plan a sustainable future to protect the lifestyle we all choose to live. We want nothing to stop us achieving that and believe the National Park will stop us, even if it borders our boundary. (305, 307)</p> |
| Any other comments: Question 19 | Connections - Newcastleton | <p>R100 remains a challenge for the extremely remote and rural residents, new grid connections are an avenue open to use to extend the digital highway once wind farms are approved. We encourage SBC to ensure that all efforts are taken to ensure this can be exploited as part of the planning approval process for grid connections. (307)</p> |
| Any other | Conservation | <p>Quite how some of the current area qualifies is unknown and, in any event, doesn't appear to be enforced.</p> |

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| comments: Question 19 | Area - Galashiels | Should this be reviewed with Bank Street genuinely conserved? (22) |
| Any other comments: Question 19 | Consultation and working group output | The contributor states that the 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 consultations reached this should now happen and an extension of the MIR consultation period beyond January 31 st be granted to allow comment by the public. (73) . |
| Any other comments: Question 19 | Countryside Around Towns - Melrose/ Darnick | Melrose and District Community Council consider that the green spaces between Melrose and Darnick must be strongly protected to ensure the two communities do not become adjoined. (82) |
| Any other comments: Question 19 | Cycling Routes and Tourism | The contributor states that Heriot lacks any tourism attractions or businesses, but does see visitors admiring the Borders countryside, and walkers on the core path network. Cyclists regularly pass through the area, and the village lies on the 250 mile "Borderloop" and 79 mile "Borderloop4 Hawick" routes, as well as the route of the annual "Tour de Lauder" event. Further efforts need to be made to ensure that Cycling routes to the Edinburgh conurbation area are developed. (105) |
| Any other comments: Question 19 | Delivery of Infrastructure | The contributor states that Scottish Borders Council's Roads Department comments on planning applications for industrial development but, to use the Charlesfield biofuel plant as an example, insufficient analysis seems to be made of the impact of frequent long/wide/heavy vehicle loads on our minor road network before planning approval is given. Surely, when SBC is under considerable financial constraints and can't be expected to fix every pothole as it appears, those behind the industrial development should be required to pay an additional fee, particularly as most of these developments only bring a handful of new jobs - if any- to the area, and not the 100s that the bigger Borders towns need. And/or constrain industrial development to land zoned and serviced for industrial use. (137) |
| Any other comments: Question 19 | Developer Interest - Peebles/ Galashiels/ Hawick | This report appears to be taking the easy route in that SBC are aware that potential developers are only attracted to Peebles as it will maximise their profits. Building in Hawick and Galashiels for instance will not provide such rich pickings. (149) |
| Any other comments: Question 19 | Development along the Railway Corridor | The contributor requests that the railway is looked at and possibly extended railway corridor as prime development for all sorts of good reasons. (197) |
| Any other comments: Question 19 | Development Impact - Scottish | The contributor runs Ruberslaw Wild Woods camping and are well placed to convey the appreciative, concerned, worried views of their customers with regard to unspoilt countryside, wildlife etc. and development that would undermine the scenic, wildlife and similar assets that the Borders still has in parts. |

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| | Borders | (146) |
| Any other comments: Question 19 | Digital Connectivity - Heriot | Heriot has a flourishing community broadband service that already serves all residents, without exception, who wish to receive high speed broadband. Heriot set up this service in 2012 onwards, and has raised all the finance necessary. The service is now part of a much bigger provider, Borders Online, which covers much of the northern Borders and also parts of Midlothian. With Universal Service Obligation (USO) already being widely mooted, recognition of our broadband service is long overdue. This service requires recognition from the appropriate bodies in SBC and the Scottish Government. (105) |
| Any other comments: Question 19 | Digital Connectivity - Newcastleton | Without robust communications business and community development is stifled; superfast is now available within the heart of Newcastleton but delivery to the outskirts and wider reaches is still very hit and miss. (307) |
| Any other comments: Question 19 | Edinburgh City Region Plan | Although the Borders are included in this, they do not seem to benefit from it at all, other than being forced to accommodate Edinburgh's overflow population, and bear the costs of so doing. Instead of retaining in Edinburgh all the important research and technology developments, the Edinburgh City Region Plan should be creating at least 2 Centres of Excellence and Technology in the southern Borders in towns such as Selkirk, Hawick and Jedburgh, to help these towns become vibrant and sustainable. The MIR in its current form does not serve the Borders population well. (108 (2 of 2)) |
| Any other comments: Question 19 | Education - Selkirk | Selkirk and District Community Council is of the view that a Masterplan and vision is required for the whole Selkirk High School site, including an assessment of present buildings (and capacity), the Argus site, playing fields and the context of the Pringle Park which is Common Good land. This should also include consideration/location of a replacement for Knowepark Primary School which could be incorporated in the overall planning context. This vision could be defined on the east by a defined line of Selkirk by-pass. (305) |
| Any other comments: Question 19 | Entertainment Venue - Galashiels | The town could benefit from a major music/entertainment venue. It requires something such as this to create a destination town. (24) |
| Any other comments: Question 19 | Fairness and equality of what is best for residents | The contributor states that they hope that the principles of fairness and equality and consideration of impact both positive and negative and what is actually beset for current residents are driving the decision making for the need for domestic and industrial development and not the other way round. The process should not be the driving force, people and the environment should. (197) |
| Any other comments: Question 19 | Flood Plain | The contributor states that several flood plain sites are identified but why not go one further and do as happens on the continent stipulating that developers will only get approval if they design homes with garages/utility at ground level and all living space above? One new development in the middle of Gala close to the rail station features this design. (137) |
| Any other comments: Question 19 | Flooding issues | The contributor states that flooding issues are mentioned frequently and given climate change, need to be taken much more seriously and looking forward rather than just 5/10 years. (197) |
| Any other | Forestation/ | This continues to encroach on open farmland, particularly the upland pastures. Planning for planting is |

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| comments: Question 19 | planting - Newcastleton | devolved to FCS which again further removes the community's role in consultation and recourse in the event of problems. SBC will be aware of issues caused by felling and planting at Lauriston caused adjoining residents' problems because the planting plan was not adhered too. (307) |
| Any other comments: Question 19 | Forestry | The contributor states that the Scottish Governments policy on Forestry should be applied in cross compliance with the Land Use Strategy. Blanket conifer planting is not in accord with the LUS. There is plenty of room in Scotland for forestry to be integrated with other land uses in accordance with the LUS. Instead, perverse incentives are being allowed to increase blanket forestry in the Southern Borders. This destroys local communities, damages the salmon rivers and exacerbates flooding. Where woodland and forestry are integrated with farming, tourism, flood management and other environmental protection, in accordance with the LUS, local communities and the wider economy benefit. Blanket forestry mainly benefits absentee landlords, often companies or non-residents. (280) |
| Any other comments: Question 19 | Foreword | 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. (73) |
| Any other comments: Question 19 | Green/ open space - Selkirk | Selkirk and District Community Council is of the view that SBC should ensure that Selkirk Hill is listed as part of Selkirk's environmental assets, especially as its management is undertaken by a sub-group of Selkirk Community Council. (305) |
| Any other comments: Question 19 | Green Infrastructure | The planning and cross fertilisation of monies for green infrastructure needs stronger expression. If Eddleston and Eshiels become de facto remote suburbs of Peebles, the connecting links to encourage modal transfer needs to be put in before any more large allocations. At Duns, whilst safeguarding the Duns Scotus Way and the wetland are fine, given all the conterminous allocations there is a need for advance project planning in green infrastructure through an integrated SUDS to maximise biodiversity benefits. These are just two examples re green infrastructure. (236) |
| Any other comments: Question 19 | Hotels - Galashiels | It may be appropriate to have some policy relating to hotel development and where this may be encouraged. Mainly hotels need to be looked at on their own merits and should be encouraged in particular Galashiels where the railway has a principal nodal point with transport interchange. Whilst Galashiels might not be a prime tourist attraction, it could become a hub for tourists to the area, in particular those arriving without a car, i.e. by train and bus. (24) |
| Any other comments: Question 19 | Implications for rural land use following Brexit Newcastleton | Newcastleton and District Community Council (NDCC) state that many will need to diversify out of necessity not choice; planting is one of these options and we have already discussed planting on large swathes of local land and our concerns regarding this. The community fears for the traditional upland farm for which our present geology is suited, any decline in this will also impact on traditional skills like dry stone walling and hedging further impacting on the natural environment and eco systems that rely on them. There does need to be wider debate about what happens post Brexit and Newcastleton would be keen to participate in this debate at the appropriate time. (307) |

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| Any other comments: Question 19 | Improvements to digital connectivity | The contributor states that improvements to digital connectivity must be given the highest priority to encourage business to the area. (289) |
| Any other comments: Question 19 | Increased use of cars (as a result of development) | The contributor states that the proposed development sites and increased use of cars, specific transport studies, e.g. town sites, are more environmentally friendly whereas rural sites increase fossil fuels. Environmental damage caused by increase of vehicles, inadequate road systems and prejudice to highway safety. Question whether proper surveys have been undertaken. (197) |
| Any other comments: Question 19 | Infrastructure - Reston | The contributor makes reference to infrastructure, specifically in the context of Reston. They state that the railway has such importance to the area, it is absolutely vital that all necessary infrastructure pre-planning is in place before it arrives. As well as roads infrastructure, roads and parking etc, no doubt involving engaging with Scottish Water on water supply, on main surface and foul sewers within the village, and on the capacity of waste water treatment works. They raise concerns regarding the primary school and the need to determine whether a site for a new one is required or reaching a solution which also involves Ayton and Coldingham schools. (144) |
| Any other comments: Question 19 | Infrastructure - Scottish Borders | The contributor states that existing towns and communities within the region are struggling with poor and outdated infrastructure services. Existing infrastructure should be made fit for purpose before any plans for future growth are considered. (145) |
| Any other comments: Question 19 | Infrastructure Provision | Contributor 90 feels that the issue of ensuring that infrastructure matching development has not been dealt with enough, with too little, if any, analysis of what additional services and infrastructure is required in areas that are proposed for significant development. Contributor 270 states that they can understand the need for more housing but the local infrastructure of schools doctors, sewage etc need to be improved first. (270) Contributor 277 states that there is no real detail provided on infrastructure requirements where development is taking place (ie) what is the impact on existing infrastructure of a development, particularly on health, social care and education. Contributor 318 states that there is limited discussion in this MIR about vitally important subjects such as the need for significant investment in education, transportation and water and drainage. These are important issues raised by members of our communities and the MIR has very little content that addresses these in any detail. Contrary to what planning officers have said at MIR consultation meetings, there is a great deal of anecdotal evidence, as well as evidence from medical practitioners which flatly contradicts the rather rosy view of officials that there is sufficient capacity within our GP facilities in particular. They also state that before further sites for development are considered there needs to be a root and branch review of the |

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| | | <p>infrastructure. This review must examine the issues of:</p> <ul style="list-style-type: none"> • Schools capacity. • Health facilities, to include GP services and access to hospital services. • Social care. • Sewerage and drainage capacity. • Roads into and around the town, this must also include a full review of Tweed Bridge capacity and the ability of our streets to absorb more traffic. <p>It should be noted that concerns already exist (in relation to Peebles) with regard to all these aspects of infrastructure need; any additional development will only exacerbate an already difficult situation in this regard. (90, 270, 277, 318)</p> |
| Any other comments: Question 19 | Infrastructure Provision - Peebles - Sites for new facilities | The contributor states that it would have been helpful if sites were identified as possible locations for a new Peebles High School and Health Centre expansion so that a fuller picture could be envisaged. (181) |
| Any other comments: Question 19 | Infrastructure Provision - Peebles Cemetery | The contributor states the current cemetery is nearing capacity, the Community Council has been raising this issue with elected Councilors for a considerable time; no response or plans are forthcoming. It is noted in the MIR that no provision has been made for cemeteries though there is mention in Appendix 3 that a new policy is required to address these issues. This situation in Peebles is becoming urgent, a solution needs to be found. Should the various sites in this MIR be adopted within LDP2 the situation will become critical. (318) |
| Any other comments: Question 19 | Investment and Flood Implications - Newcastleton | The contributor states that without a flood defence strategy investment, growth cannot be encouraged or expected from new business. This is stifling expansion for commercial operations and new housing and limits development at the south end of the village as well as across the Liddel. The contributor also states that they are hugely concerned that planting on private estates is not included in flood assessment planning, is not published and extractions not managed in the same manner as public estates further down the line. This has huge potential impact for the longer term unless steps to manage this are included at the outset of any flood scheme. (307) |
| Any other comments: Question 19 | Investment in the Eastern Borders | The contributor states that the eastern side of the Borders needs more investment and attention and the plan is very unbalanced in that respect. (291) |
| Any other comments: Question 19 | Key Greenspace - GSHERI001 Play Area - Heriot | The small playpark at Heriot Station area is already protected in the current LDP. However, it also is badly in need of renovation and also proper drainage. SBC assistance and advice are required for a successful renovation. (105) |

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| Any other comments: Question 19 | Lack of community engagement | The contributor states that the precise level of engagement with land owners is unknown by the community, although it is thought to have been very poor. They highlight that a fundamental aspect of site deliverability is landowner and developer willingness and sites should only be allocated where there is such willingness to engage in taking forward the development process. (91) |
| Any other comments: Question 19 | Land Use Strategy | The contributor states that excellent work has already been carried out in Scottish Borders, on the application of the Scottish Government's Land use Strategy. However, the momentum appears to have been lost. If anything is happening could we please hear more about it. If not, could we please see more action on this front. (280) |
| Any other comments: Question 19 | LDP Contents | The contributor states that the LDP is 120 pages long, contains many technical issues and terms with references to many other policy documents. They 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 ' <i>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</i> '. (80) |
| Any other comments: Question 19 | Local Housing Need - Newcastleton | <p>Newcastleton and District Community Council (NDCC) advise that previous unsociable behaviours encountered as a result of urban families occupying social housing has meant that local families have not felt comfortable applying for family homes in the community, this is now not the case. Local families are actively encouraged to apply for these homes so that we do not continue to see migration of young families which impact on local services and amenities with concern for the primary school. Homeownership or long tenancies for young families MUST be more readily achievable or Newcastleton will become a village of pensioners.</p> <p>In addition, the local housing study undertaken in 2015 identified need as being ground floor 1 & 2 bed properties to home elderly who would downsize from larger properties needing investment, freeing these for young families. This needs consideration within the local plan with sites allocated to encourage development and investment for ground floor builds – the estimated increase in the aging population for our village is alarming, planning locally needs to address that now. NDCC recognise that new modern housing cannot be provided without a flood scheme.</p> <p>There is desire locally to have modern, fit for purpose, family housing by private developers. Many young homeowners are frustrated with current housing stock which is old and needs modernising. With investment in flood defences this can become a reality. (307)</p> |
| Any other comments: | Lowood (MTWEE002) | SBC will be fully aware of the necessary environmental guidance and “requirements” set out for the specific allocation in the SG and these relate to a broad range of constraints related to: |

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| Question 19 | <p><u>Flood risk</u> Including reference to the site being constrained due to flood risk: consideration needing to be given to bridge and culvert structures within the site, the likelihood of flooding issues within the site, the site not being currently within the sewerage catchment, the site in part being shown to be at flood risk within the 1 in 200 year indicative flood map and the requirement for a flood risk assessment.</p> <p>SPP advocates flood avoidance by safeguarding flood storage and conveying capacity and locating development away from functional flood plains. SPP advises that for planning purposes an area of land will be deemed to form part of a functional flood plain and thus remain free from development, save in exceptional circumstances, if it is shown that it will generally have a greater than 0.5% (1:200) probability of flooding in any year.</p> <p>SEPA's Technical Flood Risk Guidance for Stakeholders (Version 10 July 2018) at section 5.2, however, advises that for locations at or near to "hydraulic structures" (i.e. bridges and culverts) a sensitivity analysis has to be applied to the modelling to take account of the fact that such structures may be subject to blockage. At such locations SEPA's "long term position" is that the "0.5% 1:200 + blockage scenario" should be deemed to represent the extent of the functional floodplain.</p> <p>In terms of SEPA Planning Information Notice No. 4, in assessing whether a site is at high risk of flooding, no account can be taken of informal flood defences such as embankments.</p> <p>SPP advises planning authorities to promote flood avoidance: by safeguarding flood storage and conveying capacity, and locating development away from functional flood plains and medium to high risk areas.</p> <p>Against that policy framework the SG advises that a flood risk assessment (FRA) is required as the site is identified as being at risk from a 1:200 year flood event from fluvial and surface water flooding. The SG further advises that the FRA will require to assess the flood risk from the River Tweed and demonstrate how the risk from surface water would be mitigated. It also provides that consideration will need to be given in the FRA to bridge and culvert structures within and adjacent to the site.</p> <p><u>Sustainability & SAC/Habitats Regulatory Assessment</u> The contributor states that considerable requirement to safeguard trees and mitigation is required to ensure no significant adverse effects on the integrity of the River Tweed Special Area of Conservation (SAC), the need to maintain and safeguard mature parkland trees and woodland and the need for an appropriate buffer to the River Tweed SAC and Site of Special Scientific Interest (SSSI).</p> <p>The HRA produced by the Council confirms that housing development on the Tweedbank site is likely to</p> |
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| | <p>have a significant effect on the conservation objectives of the River Tweed SAC. The contributor quotes a case at the European Court of Justice (ECJ) as an example of a recent decision, regarding habitat regulations.</p> <p>The contributor states that the Council has failed to carry out an appropriate assessment (AA) as part of that process set out the mitigation measures that would be needed to ensure that an adverse effect on the River Tweed SAC did not occur. The Council consequently also failed to consider whether the implications of mitigation measures would impact on their client's riparian interest. Critically, in terms of its assessment of the effectiveness of the site, it has no information before it which would allow it to conclude that there would be no HRA obstacle to planning permission for housing development on the site being granted. Without information on whether the anticipated adverse impact can be properly mitigated, it follows in turn that the Council is currently unable to assess the cost involved in providing the appropriate level of mitigation and the impact which that additional cost may have on the overall viability of the site. This may include the payment of compensation.</p> <p><u>Landscape Assessment and Principles</u></p> <p>The SG makes it clear that development in the "policies and parkland" characteristic is "severely constrained by the quality and integrity of the designed landscape associated with Lowood". This important point has been further confirmed in the landscape review undertaken by landscape architects Horner & MacLennan for MPL and as set out in the JLL Report. This states that there are clear indications of a designed landscape and much of the woodland structure has a potential Tree Preservation Order (TPO) quality and there is a need to protect the secluded quality and setting of the River Tweed.</p> <p>Jones Lang LaSalle Limited Registered in England & Wales Number 1188567 Registered Office 30 Warwick Street London W1B 5NH</p> <p>Reference is also made to the exceptional quality of the parkland area and it is explicitly stated that any mundane development would constitute a wasted opportunity and would likely cause "environmental degradation". Note this is the SBC position. This is a very important point as it is clear from even the non-redacted sections of the Ryden Report referred to above, that because of the severe commercial viability issues facing the Lowood site, the consultants seem to pointing to the need to pursue much more standard housing development types and higher densities which would cut across this important environmental objective and "requirements" as set out in the original SG for the Lowood allocation. This unacceptable proposition is set out explicitly in the Ryden report, which states at paragraph 2.14.20 that with regard to the current 300 unit allocation for Lowood "...it represents a low density position and one where we would expect the market to try and increase the number of units delivered in the medium to longer term".</p> <p>The Report adds at paragraph 2.14.23 "we would have expected the market to strive for a higher density</p> |
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| | <p>proposal going forwards, quite possibly closer to 25 to 30 units per hectare (10/12 units per acres)...this would suggest the potential for up to 375 to 450 residential units being delivered [at Lowood] in the long term”.</p> <p>Such an increase in housing numbers to improve the viability of the site’s development can only negatively impact on the site planning and environmental principles set out in the SG, increase infrastructure costs and environmental impact. This is not an acceptable approach and underlines the non-effectiveness of the site on the basis of what is proposed in the SG.</p> <p>Related to this type of approach, the Council’s aspiration for a form of boutique hotel at Lowood (using the existing country house) if surrounded by a high density volume housebuilder estate of up to 450 housing units would seem highly unrealistic.</p> <p><u>Planning Infrastructure</u> Opportunity and possible need to provide a new bridge across the Tweed to replace the existing bridge – and clearly if housing numbers are to increase which as noted above in our view would be environmentally unacceptable, this is going to drive the need for greater infrastructure provision.</p> <p><u>Education</u> Extension required to primary school provision.</p> <p><u>Waste Water Treatment Works</u> No gravity solution available. Any upgrade to the WWTW will need growth criteria, furthermore there may be local network issues that need to be addressed and funded by any developer to enable connections.</p> <p>Therefore, it is clear from the above that as set out in the SG, there are a wide range of specific sensitivities and considerable constraints identified by consultees that would need to be taken into account with regard to the development of the Lowood site. Whilst the Council points to further consideration of these matters in a Development Brief that is yet to be consulted upon, it is the contributor’s considered view that the scale of the issues presented by the Lowood site combined with a very poorly performing housing market, clearly indicate that the scale and quality of development envisaged in the Masterplan report is undeliverable and the site in that regard is ineffective as this justifies de-allocation and the pursuance of much more suitable opportunities which can allow the Scottish Borders to provide deliverable and effective housing land opportunities. To fail to take that approach means a social and economic opportunity cost for the SBC area and will likely require much more substantive public-sector funding.</p> <p>In addition, from the contributor’s review of the SBC Brief for the Tweedbank Masterplan – clear aims are</p> |
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| | | <p>set out for the Masterplan with regard to place making environmental considerations and principal aims require that:</p> <ul style="list-style-type: none"> • Clear guidance is provided on the delivery mechanism for the development of the site; • A scale and mix of uses is proposed that are deliverable in the context of the prevailing and anticipated market conditions and that; • The Masterplan needs to be comprehensive and cohesive based on a place making approach that is viable, sustainable and deliverable. <p>From our review of the Masterplan (as set out in the JLL Report) we have been very clear in our conclusions that the process that has been followed and the outcome that is expressed in the overall Masterplan documentation contains inadequate information on these matters and what is demonstrated is that there are very considerable constraints present that will prevent these aims and objectives from being achieved. In addition, a fundamental point is that because the development as set out in the masterplan is commercially unviable, there will not be any private sector contributions to infrastructure provision and as such development, certainly at the scale envisaged in the SG, would need to be dependent upon very substantive public-sector grants and significant pump priming.</p> <p>Our overall conclusion remains, as set out in the JLL Report of March 2018, that the Council now has an opportunity to address this serious matter with regard to Lowood, by acknowledging at this stage that the site's proximity to sensitive national and European environmental designations, combined with the commercial viability and deliverability issues, all set against a very weak housing market dynamic, provide justification for not allocating. (92)</p> |
| Any other comments: Question 19 | LUC Study | The contributor states that there are markers for LUC but there are still concerned about the ability to genuinely appraise quality of place and quality of life at a settlement level. (236) |
| Any other comments: Question 19 | Main Issues Report | <p>Contributor 274 states that the document is very good and comprehensive.</p> <p>Contributor 290 states that the consultation and planning to date has been comprehensive.</p> <p>Contributor 295 states that the document is a good start and states thank you for the consultation. (274, 290, 295)</p> |
| Any other comments: Question 19 | Main Issues Report Document - Maps | <p>Contributor 276 states that the scaling of maps is not universal, this is unhelpful and misrepresentative.</p> <p>Contributor 305 states that it is disappointing that the settlement maps contained in the document are poor. They give virtually no context and no north point to assist orientation or proper understanding. (276, 305)</p> |

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| Any other comments: Question 19 | MIR Procedure | 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 <i>before</i> LDP2 is constructed. (73) |
| Any other comments: Question 19 | New railway station at Reston | The contributor states that they support the continued identification of the location of a new railway station at Reston within LDP2. Network Rail has been working closely with Scottish Borders Council in respect of the new station and this will be progressed in line with Scottish Government aspirations in Control Period 6 (2019-2024). (294) |
| Any other comments: Question 19 | Objections to Planning Applications - Relationship with MIR | 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 <i>but even more so</i> 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. (73) |
| Any other comments: Question 19 | Opportunities for Carlisle airport - Newcastleton | <p>Newcastleton and District Community Council (NDCC) note that this matter has a one-line reference within the MIR which is hugely disappointing given that the airport is owned and operated by the UK's largest private freight operator Stobart's. NDCC recognise it is in England and the MIR is about development and planning in the Scottish Borders, but Newcastleton is their nearest Scottish neighbour, surely the airport deserves bigger consideration than this given the opportunity it could provide us and the wider Scottish Borders?</p> <p>Newcastleton & District Community Trust and NDCC discussions with Stobart to date indicate huge willingness to forge development dialogue and explore opportunities cross border.</p> <p>Newcastleton believes that the airport will deliver an affluent southern based visitor as well as opportunity to tap into jet-set international markets that use the airport. This valuable tourism pound should be being actively attracted to travel north to exploit the Scottish Borders and Scotland. SBC need to work with other public sector partners to make this happen and to ask Carlisle council and Stobart how we can work together to exploit this development.</p> <p>Additionally, given Stobart's freight experience, reputation AND their proximity to the old Longtown freight depot there is huge opportunity for rail to be developed for freight. This opportunity is on our doorstep and needs much more effort to understand and explore the potential this could deliver as part of the economic benefit of extending the railway line to Carlisle and embracing freight. (307)</p> |
| Any other comments: | Plan Period (LDP and SDP) | <p><u>LDP</u></p> <p>The contributor does not dispute the expected year of adoption or the 10 year period (2021/22 – 2030/31)</p> |

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| Question 19 | | <p>set out within the Housing Technical Note, however would note that there may be significant delays to the plan making process as a result of the delays in the approval of SESPlan 2. Therefore, a review of the programme of approval of the Scottish Borders LDP may be required to ensure that timescales have not slipped such that the expected year of adoption has now been pushed to 2022/23 meaning the plan period for the LDP would have to be amended to 2022/23-2031/32. (306)</p> <p><u>SDP</u> The contributor states that there are currently a number of different plan period in front of the Scottish Ministers who will be required to make a decision on which will be included within the approved SDP. The contributor outlines these within their submission. (306)</p> |
| Any other comments: Question 19 | Policy and Guidance | The contributor states that Scottish Borders Council should always apply both their own and guidance and that of the Scottish Government at all times. (25) |
| Any other comments: Question 19 | Premature publication of the MIR, before the adoption of SDP2 | <p>The contributor raises concerns that the MIR was prepared, published and consulted on, prior to the approval of SDP2. The necessary amendments to the number of new homes that require to be delivered over the LDP plan period after the approval of SESplan 2 by Scottish Ministers in due course, will substantially change the plan's course.</p> <p>State that there is no indication as to how the Council will approach the process of updating the LDP in line with the approved SDP, whether there will be an updated MIR published or whether the Council intends to update the housing numbers and allocations as part of the preparation of the Proposed Plan.</p> <p>It is essential that the MIR deals with the HST and HLR for the new LDP and goes on to assess the preferred and alternative ways of delivering this housing requirement through housing allocations and this should not be carried out at the Proposed Plan stage.</p> <p>The contributor requests that the Council provide further detail to all stakeholders and members of the public on how it will provide appropriate opportunity for any interested party to provide representations on an amended MIR at such time as the SDP is approved and there is clarity on all aspects of detail within the SDP that the LDP is required, by statute, to be consistent with. (306)</p> |
| Any other comments: Question 19 | Private planting on estates governance - Newcastleton | Newcastleton and District Community Council (NDCC) note that communities are challenged by the rules governing private planting on estates v public planting and why one has consultation and the other doesn't? One is managed, the other not. Community feedback is welcomed in one and listened too with politeness and ignored on the other. (307) |
| Any other | Process - | National Grid has no comments to make in response to this consultation. (3) |

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| comments: Question 19 | Consultation | |
| Any other comments: Question 19 | Process - Consultation | The contributor questions why can there not be consultation for the part of the Borders where people reside. People from Yetholm don't really care what happens in Peebles? (203) |
| Any other comments: Question 19 | Process - Consultation | The contributor states the Citizen Space interactive consultation was easy to steer through, well done to whoever designed it. (206) |
| Any other comments: Question 19 | Process - Consultation | The contributor suggests the form could be made simpler for the general public to complete. (285) |
| Any other comments: Question 19 | Process - Consultation | Contributor 243 states there could have been more public consultation about these proposals. They also state that they received information from local residents who informed them of the opportunity to comment via the online survey. Contributor 298 states that the Council needs to better communicate future plans/consultations, especially ones like this that could have a massive impact on the existing population. They recognise that it's old fashioned but a letter drop would have had much more comprehensive reach than what was done. (243, 298) |
| Any other comments: Question 19 | Process - Consultation | Contributor 277 states that there is no indication that the public feedback will be consolidated and/or shared back with the public so we have a real feel of what people have said and think. Whilst sharing anecdotes may be ok this should also be backed with analysis. Contributor 289 found the consultation response to be very time consuming and feels that this will not allow for a wide and representative response from all interested parties, accept that this is a wide and complex area but there feels to be a need to simplify the process and remove the focus for reliance on on-line responding. (277, 289) |
| Any other comments: Question 19 | Process - Consultation | The contributor considers that given that this consultation process is being carried out across the whole Borders region and affects so many communities, it is very surprising that the consultation process itself is not more transparent. Unlike the planning process where detailed plans can be found alongside other relevant comments and objections on the planning portal and open to scrutiny by all, this consultation process seems to be a private affair where officers receive the comments and then proceed to develop the next LDP. The public, as far as we are aware, has 16 that objections and other comments are accurately and properly taken into account. This is unacceptable and must be rectified. It is essential that the public can see what others have said and that their views have been properly considered when the LDP is |

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| | | completed. (318) |
| Any other comments: Question 19 | Process - Consultation | Scottish Government no longer comments on Main Issues Reports (314) |
| Any other comments: Question 19 | Process - Consultation with NHS & Education on sites | <p>Contributor 198 states that they would like to be advised what questions were asked by whom and what answers were received in relation to the sites identified within the MIR.</p> <p>Contributor 220 states that they are a GP and are well placed to appreciate the strains on health and social care services in the Borders. There is no meaningful knowledgeable interaction between SBC and health. The contributor states that they do not know who gives information from the Health side but they do not know the stresses and strains within the system. The contributor states that they were informed that there is adequate capacity at Haylodge, but how would they know, we have never been asked. There is a fundamental lack of knowledge of how GP services are commissioned and organised.</p> <p>Contributor 277 states that at the public consultation meeting they were assured that SBC had made enquiries of the relevant bodies regarding capacity for Health Care and School capacity. However a Doctor from Hay Lodge (present at the meeting) advised councillors that the two practices were very much at or beyond capacity as it stands and that the Health Authority were not in a position to know whether there was capacity because of the way Practices are structured. There is no provision to add capacity.</p> <p>Contributor 318 questions the consultation process undertaken with NHS and Education. The contributor refers to the SBC school estate review dated 26 April 2018 which discusses capacity at various Borders secondary schools. This document makes it clear that there are no capacity issues for secondary schools in Galashiels, Selkirk or Hawick. The picture for Peebles is very different. This document states that Peebles High School in April 2018 was at 86% capacity. The following comments were also made, <i>“In Peebles, however, the school roll is currently the largest it has ever been over the past 20 years. Based on current primary school rolls within the cluster, occupancy is projected to sit between 90% and 95% in the next four years...these figures do not take into account any current or future house building in the cluster.”</i> That the contents of this school estates review has not informed the construction of this MIR is of serious concern and raises issues regarding the way in which the MIR has been compiled. Indeed within the conclusions of the school estates review it is said that, <i>“this work (of the review) will need to link into housing developments and the production of accurate medium and long term pupil roll projections.”</i> This apparent lacuna provides further illustration of the need for transparency. Also, the existence of this document with such important commentary begs questions of the various responses received from officers in Education and Planning. Were officers aware of this document? If they did know, then why was it not produced when requests were made for information? In relation to health, Council Officers say that they have had conversations with NHS staff who have said</p> |

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| | | that there is sufficient health care in this area. There has been no detailed analysis conducted, that the contributor is aware of and have requested, that could be used to demonstrate what the current position is. Indeed, close examination of the MIR background documents relating to preferred and alternative sites shows the very clear statement that the NHS has not responded to requests for information. The contributor states that they are left questioning the basis for the assertion that there is sufficient health care capacity. This further illustrates the need for transparency in these processes. (198, 220, 277, 318) |
| Any other comments: Question 19 | Public Transport | The contributor states that the removal of the subsidy for the bus service beggars belief. (240) |
| Any other comments: Question 19 | Public Transport & Maintenance - Heriot | The contributor states that the current X95 bus service now runs on an hourly basis and it is essential to Heriot that it is protected and encouraged. In addition, the future of the Heriot station area depends on proper maintenance of the Railway underpass. Winter maintenance is currently inadequate in severe weather. (105) |
| Any other comments: Question 19 | Recreation | There is a need for indoor family activities around the Borders such as soft play, especially in areas such as Tweedbank. (272). |
| Any other comments: Question 19 | Relationship with National Policy Guidance | 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. (73) |
| Any other comments: Question 19 | Right to join the public highway? - Newcastleton | Newcastleton and District Community Council (NDCC) request better protocols and consultation regarding wood extraction and new connections to the public highway. Recent wood extractions using temporary forest roads joining the carriageway (on bends that are already more prone to road wear), resulted in major damage in a concentrated area making usage impossible and resulting ultimately in road closures which has huge impact on our community. This needs better assessment. (307) |
| Any other comments: Question 19 | Rural Economy | 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. (73) |
| Any other comments: Question 19 | Scottish Borders | The contributor is of the view that the Galashiels and Melrose areas get priority over others and that the Council needs to start thinking of the Borders as a whole. (297) |
| Any other comments: | Scottish Borders - | The contributor quotes paragraph 5.8 from the MIR regarding the Scottish Borders outstanding scenic qualities within its landscape and planning policy seeks to protect it. The contributor questions how planning |

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| Question 19 | scenic quality | policy has in fact protected our outstanding scenic qualities, for example through the actions taken in LDP1. (73) |
| Any other comments: Question 19 | SESPlan 2 Decision | The contributor states that it was premature to have consulted on the MIR given that the SDP is yet to be approved, particularly as the plan is highly likely to be amended as a result of the Reporter's comments. These amendments may be subject to further scrutiny by the Scottish Government resulting in further changes. (129) |
| Any other comments: Question 19 | Settlement Boundary – Coldingham Sands | The contributor suggests that Coldingham Sands should be given the status of a village and they argue for the village development boundary drawn to include the land adjacent to Creel House. In general though. (327) |
| Any other comments: Question 19 | Sightlines - Newcastleton | Newcastleton and District Community Council (NDCC) note that given the challenges of getting connectivity into the valleys and wider landscape it is imperative that treelines/heights are policed so that delivery of line of sight masts (should these be the solution for R100) be clear. Currently, it is NDCC's understanding that they are not, and the FCS are under no obligation to consider this. NDCC consider this should be a material planning consideration and be enforceable to ensure that connectivity can be delivered to the difficult to reach places. This needs to be in place to ensure that tree growth over time does not inhibit service delivery. (307) |
| Any other comments: Question 19 | Standalone Settlements - Scottish Borders | The contributor supports the statement in paragraph 5.9 of the MIR, regarding standalone settlements in high demand areas, while appreciating that any such proposals will have to be carefully considered. It follows that it may be useful to draft criteria in this respect for the LDP2. (152) |
| Any other comments: Question 19 | Statistical Analysis | <p>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? (73)</p> <p>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? (73)</p> <p>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? (73)</p> <p>The trends of outward migration of younger age groups and general increase of the elderly are worrying. Visionary and flexible physical planning is therefore required in order to encourage new technologies and</p> |

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| | | businesses which can stimulate the community, attract new enterprise and maintain a stable/ vibrant population. (305) |
| Any other comments: Question 19 | Sustainable Urban Drainage Systems (SUDS) | SEPA state that all new developments should manage surface water through the use of Sustainable Urban Drainage Systems (SUDS). They recommend that this requirement includes the use of SUDS at the construction phase in order that the risk of pollution during construction to the water environment is minimised. (119) |
| Any other comments: Question 19 | Target for mixed use / business and industrial / housing land | Contributor 277 notes that the total of mixed use land (preferred) is 37.5 HA, with pure commercial land at 11.7HA and residential at 23.1HA. The issue is that there seems to be no target for the percentage split between commercial and residential on mixed use land. Developers will undoubtedly make more out of housing than industrial so will favour the former in the same way as they favour non-affordable housing over affordable housing even though there is a clear target for that. So the contributor believes a target should be included. On average the housing density derived from preferred housing sites is just under 13 per HA, for mixed use it is just under 10 - so there is an implied target of circa of apron 25% so why not set that as a target? Contributor 318 states that with regard to mixed use sites, there must be clarity as to what this term actually means. There are examples where mixed use sites are predominantly residential with an occasional shop or workshop included to satisfy the characteristics of a mixed use site. The contributor suggests that there should be a minimum, and a maximum percentage of housing developed on such sites. This would help to ensure that there is a mix of use and the retention of land for economic use. (277, 318) |
| Any other comments: Question 19 | Transport | The contributor conveys their support in terms of: <ul style="list-style-type: none"> • the dualling of the A1 and local improvements to the A68 and A7 to improve journey times (section 2.21) • the importance of improved connectivity with better walking and cycling networks and promotion of the need to reduce travel and encourage more low carbon transport choices. (section 7.3) • reference to the Borders Railway being a success in giving improved connection to Edinburgh and the reference to Northumberland County Council's intention to continue to support the promotion of the line extending south to Carlisle as well as an improved rail service for the Berwickshire communities with a rail halt at Reston. (Section 2.11) (100) |
| Any other comments: Question 19 | Transport - Borders Railway | Melrose and District Community Council state the need to support the Borders Railway which has been a great success. It is vital however that a much more reliable and better service is provided to encourage the use of the railway to grow. (82) |
| Any other comments: Question 19 | Transport - Selkirk By-pass | The Selkirk and District Community Council supports the proposed A7 by-pass to avoid the town centre (whilst still providing access to the valleys). Selkirk CC still supports the need a by-pass – all the arguments have been well rehearsed and set out in writing – and to avoid damaging the benefits which have been gained through recent regeneration work. Already supported by the Selkirk community (via local survey |

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| | | poll) and seen as a priority by the A7 Action Group. Project also discussed at Holyrood with the tacit support of the (then) Transport Minister Humza Yousaf – noted that a by-pass is in keeping with the vision and aspirations of the National Transport Strategy/ National Planning Framework and current SESPlan which identifies the A7 route as part of the Midlothian East/ Borders regional corridor and includes in its objectives to improve connectivity and safety. Opportunity to zone specific residential and employment land to help meet future targets – land in this area would encourage/ promote better quality development. (305) |
| Any other comments: Question 19 | Transport - Newcastleton | Newcastleton and District Community Council (NDCC) state that improved signage directing vehicles from the trunk roads needs to be considered to support services and amenities. The road network around Newcastleton continues to be hugely damaged by HGV's and timber wagons travelling where they shouldn't be. Timber Transport voluntary code of practise needs to be enforced and fines made to drivers/contractors who abuse the road network. Necessary resource needs to be found to enforce these guidelines. NDCC reiterate that the community is keen to work with SBC to explore the outcomes of the transport feasibility study which offers massive opportunity locally to give us better transport connections and consider rail beyond just passenger to include freight. (307) |
| Any other comments: Question 19 | Transport Links - Scottish Borders | The contributor is of the view that an upgrade of the east/west road link based on the A72 (305) and further east with particular reference to new road from the north side of the Yair Bridge east to the A7 where it crosses the Tweed is required. This would obviously offer a bypass to travelling through Galashiels from say the BGH. Extend the railway from Tweedbank to Hawick. (231) |
| Any other comments: Question 19 | Transport Links - Scottish Borders | The contributor highlights transport links as a main issue. A major issue is the ever increasing congestion as commuters flood to Edinburgh on a daily basis from the Peebles area. This route must be improved in a major way if it is to take extra traffic. (283) |
| Any other comments: Question 19 | Transport Links - Scottish Borders | Selkirk and District Community Council supports the proposals to extend the Waverley Line from Tweedbank southwards and also encourages consideration of the potential for carrying freight (especially outwith conventional daytime use). (305) |
| Any other comments: Question 19 | Tweedbank Masterplan | Selkirk and District Community Council considers that this exercise was rather insular in its approach and concept – perhaps the result of an inadequate brief? Insufficient consideration given to the wider strategic / infrastructural implications and context of the surrounding roads network e.g. Bottle Bridge / Melrose Road corridor and how the expanding community will integrate with 'through' and local traffic. The CC regrets the decision to locate a relatively small hotel/retail development in this area which seems sadly misplaced, will weaken the existing Tweedbank centre and damage the local environment (with its geographic setting at the foot of the Eildons). (305) |
| Any other comments: Question 19 | Use of 'indicative' capacities | The contributor states that policies need to be clear, the language used must be precise and capable of interpretation by readers of the policy. The contributor has been in communication with SBC regarding the use of the word 'indicative' when used to describe the capacity of various sites. The SBC interpretation of this word is wrong in their view; it does not mean infinitely flexible as suggested. The LDP allocates sites on the basis of assumed capacity and indicative numbers are used by SBC to meet Scottish Government |

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| | | <p>targets for housing. The Scottish Government clearly think that these indicative capacities are relatively inflexible, for if they did not, the Government would demand more precise allocations. The LDP is developed after consideration of various issues associated with each site, including all aspects of infrastructure and transport. To then allow development which greatly exceeds the allocated capacities places greater strain on existing infrastructure. The issue of indicative capacity is not confined to Peebles; a recent application before the planning committee of SBC from another area raised concerns in this regard.</p> <p>Greater clarity is required and to this end policy should state very clearly that indicative capacity means that is what is expected to be the maximum that can be developed on the site. That is not to say that the policy needs to be totally inflexible; there needs to be a minimal amount of flexibility provided to cater for unforeseen circumstances on each site, such flexibility should be limited to, say, 5% over the stated indicative capacity. (318)</p> |
| Any other comments: Question 19 | Wildlife and impact upon countryside | <p>The contributor raises concerns regarding the despoliation of upland habitats, peatlands etc. and wild life habitat pockets expressed in relation to housing in the countryside are relevant here as well. The rarity of the so far unspoiled mountains, hills and moorlands south of the Teviot must be recognised and have proper value placed upon it in terms of future tourism and biodiversity. (146)</p> |

Strategic Environmental Assessment (SEA)

Strategic Environmental Assessment (SEA)

| Main Issue | Sub Issue | Summary of Main Issues Raised |
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| Strategic Environmental Assessment | Cardrona SCARD002 (Land at Nether Horsburgh, Cardrona) | Historic Environment Scotland state that the SEA concludes that development of this site could have a minor negative effect on cultural heritage. Whereas the contributor considers that, without robust mitigation, development of the site has potential for significant negative effects on the historic environment, in relation to the setting of Nether Horsburgh Castle. (164) |
| Strategic Environmental Assessment | Eddleston SEDDL001 (North of Bellfield II, Eddleston) | Historic Environment Scotland state that the SEA concludes that development of this site on Cultural Heritage would be neutral. However, the SEA has also identified mitigation measures relating to an Inventory designed landscapes. Additionally, the site requirements include archaeology evaluation / mitigation. This would suggest that some adverse effects are anticipated without mitigation measures in place, and consequently the Council may wish to consider revising the score for cultural heritage to reflect this. (164) |
| Strategic Environmental Assessment | Eshiels MESHI001 Land at Eshiels I | Historic Environment Scotland state that the SEA concludes that development of this site could have a minor negative effect on cultural heritage. We consider that, without robust mitigation, development of the site has potential for significant negative effects on the historic environment. (164) |
| Strategic Environmental Assessment | Eshiels MESHI002 Land at Eshiels II | Historic Environment Scotland state that the SEA concludes that development of this site could have a minor negative effect on cultural heritage. We consider that, without robust mitigation, development of the site has potential for significant negative effects on the historic environment. (164) |
| Strategic Environmental Assessment | Galashiels AGALA029 (Netherbarns) | Historic Environment Scotland note that the assessment indicates that development of this site has potential for minor negative effects on cultural heritage. HES consider that, without robust mitigation, development of the site has potential for significant negative effects on the historic environment. (164) |
| Strategic Environmental Assessment | Selkirk ASELK040 (Philiphaugh Mill) | Historic Environment Scotland note that the assessment finds that the site is partially within the Battle of Philiphaugh Inventory Battlefield, and suggests as mitigation that development must not have a negative impact on the setting of the historic battlefield. For information, site ASELK040 is located entirely within the boundary of the Inventory battlefield. In view of this, HES recommend that the mitigation is amended to reflect the direct effects that development will have on this heritage asset, for example a development must not have a negative impact on the key landscape characteristics and special qualities of the battlefield. (164) |
| Strategic Environmental Assessment | All proposed redevelopment sites | The contributor states that it is unclear why a site specific assessment of the preferred redevelopment sites has been undertaken. This would have been helpful in determining preferred sites and identifying alternatives, and would also have enabled consultees to provide a more informed response, having had the opportunity to consider the potential site specific environmental effects and potential mitigation or enhancement measures. (164) |