

## QUESTION 1

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Main Issue	Sub Issue	Summary of Main Issues Raised	Proposed Response to Main Issues Raised	Recommendation
Vision, Aims and Spatial Strategy: Question 1	Agree with Vision, Aims and Spatial Strategy of LDP2	The contributors support the main aims of LDP2 <b>(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)</b>	Support noted.	No action required
		<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'.</p> <p>Para 3.5 states 'the LPD must seek to encourage diversification of the rural economy by supporting appropriate economic development and tourism in the countryside'</p> <p>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'</p> <p>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.</p> <p>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</p>	Support noted for the listed text.	No action required

		<p>natural environment'. <b>(90)</b></p> <p>Agree with the proposed strategy encouraging strategic growth within the three Rural growth Areas and in particular the Western Borders / Peebles. <b>(111, 114)</b></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. <b>(119)</b></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 with the transparency and consistency of LDPs for both the public and stakeholders. <b>(119)</b></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</i></p>	<p>Agreement noted.</p> <p>Support noted.</p> <p>Support noted.</p> <p>Support noted.</p>	<p>No action required</p> <p>No action required</p> <p>No action required</p> <p>No action required</p>
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		<p><i>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". 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)</i></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</p>	<p>Support noted.</p> <p>Comments noted.</p> <p>Comments noted. The Council will continue to promote a mix of qualities including consideration of natural, indigenous habitats and species.</p> <p>The Land Use Strategy is</p>	<p>No action required</p> <p>No action required</p> <p>No action required</p> <p>No action required</p>
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		<p>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. <b>(199)</b></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 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</p>	<p>referenced in policy ED3. It is considered this is a more appropriate policy for it to be referenced. It remains a pilot project and it is not considered it can be included within policy PMD1 which is a primarily policy which all proposals should be judged against.</p> <p>Support noted.</p>	<p>No action required</p>
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		<p>Natural Environment', and Encouraging Tourism and a better visitor economy. We think Policy EP7, respecting Listed Buildings should also be a priority. <b>(212)</b></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. <b>(262)</b></p> <p>Agree with aims. Additional priority should be given to capacity and quality of school and medical facilities. <b>(273)</b></p> <p>Agree - however there should be proposals made regarding the requisite infrastructure improvements. <b>(282)</b></p> <p>We agree wholeheartedly with the main aims you describe. And have no alternative proposal to put forward. <b>(290)</b></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</p>	<p>Comments noted.</p> <p>Support noted. The LDP2 process will continue to consult SBC Education and the NHS on development proposals.</p> <p>Whilst infrastructure issues and requirements are frequently referred to within the LDP an aim has been added making further specific reference to infrastructure requirements.</p> <p>Support noted.</p> <p>Support noted and the Council agrees with the specific points the author has referred to.</p>	<p>No action required</p> <p>No action required. The process will continue to consult SBC Education and the NHS on development proposals</p> <p>A further aim has been added making reference to infrastructure considerations</p> <p>No action required</p> <p>No action required</p>
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		<p>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 improved public transport links both within and beyond the Scottish Borders area.</p> <p><b>(294)</b></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</p>	<p>Support noted and the Council welcomes and agrees with the specific points stated. The Council always encourages potential developers to contact Scottish</p>	<p>No action required</p>
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		<p>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. <b>(323)</b></p>	<p>Water at an early stage to address any potential issues to be addressed. The Council has specific periodic meetings with Scottish Water which are most useful to discuss current issues and forthcoming developments.</p>	
Vision, Aims and Spatial Strategy: Question 1	Disagree with Vision, Aims and Spatial Strategy of LDP2	<p>The contributors disagree with the main aims of the LDP2 <b>(95, 158, 170, 175, 184,193, 194, 268, 204)</b></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. <b>(90)</b></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</p>	<p>Disagreement noted.</p> <p>Economic development opportunities covers a range of matters and the current adopted LDP identifies a number of, for example, business, housing and town centre allocations and opportunities within the railway corridor.</p> <p>The LDP identifies a sufficient housing land supply and It is agreed there is developer and market</p>	<p>No further action</p> <p>No further action</p> <p>No further action</p>



		<p>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. <b>(111, 114)</b></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). <b>(200)</b></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 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</p>	<p>interest in Peebles. However, the Council will not support the inclusion of the Whitehaugh site in the LDP until a second bridge is built over the tweed. The site remains identified in the LDP as a potential longer term development to be formally allocated when the bridge is built.</p> <p>The Council will continue to liaise with Education, Roads Planning and the NHS with regards to potential new development sites.</p> <p>The Council has a statutory duty to allocate housing land for future demand and must give consideration as to ensuring such allocations are within areas with proven developer and market interest. The Council liaise with Education Dept and the NHS on potential sites across the Scottish Borders. No land at Eshiels for housing has been allocated within LDP2.</p>	<p>No further action. The Council will continue to liaise with Education, Roads Planning and the NHS with regards to potential new development sites</p> <p>No action required</p>
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		<p>be used before Eshiels is considered surely. I do not agree with this development. <b>(203)</b></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. <b>(209)</b></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. <b>(235)</b></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. <b>(239)</b></p>	<p>The Council must consider allocating housing where there is a known market and developer interest. Peebles is such a place amongst others across the Scottish Borders and the Council will consider such sites in consultation with relevant consultees including Education Dept and the NHS.</p> <p>Disagree. There is a requirement to find housing land where there is a demand. Not only does housing meet this demand to satisfy the wants and needs of a wide range of occupants, housing provides many economic benefits e.g. help sustain local shops / local businesses / social and leisure clubs. There are also significant benefits for local workmen in the trade which housebuilding offers.</p> <p>The LDP process seeks to address the balance of promoting economic development and housing need as well as considering environmental and tourism issues. There remains the requirement that developments must incorporate 25% affordable housing.</p>	<p>No action required</p> <p>No action required</p> <p>No action required</p>
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		<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%. <b>(207)</b></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 keen mountain bikers and the economic growth from tourism relating to mountain biking in the Tweed Valley and in particular around Glentress &amp; Innerleithen is</p>	<p>The LDP process seeks to address the balance of promoting economic development and housing need as well as considering environmental and tourism issues. Policies within the LDP, notably policy HD5 – Care and Nursing Homes is supportive of care housing and lays down criteria tests for determining such applications, emphasising the amenity / facility / locational needs of residents. The delivery, financing etc of, for example, care / nursing homes facilities largely outwith the scope of the planning system.</p> <p>The Council has a statutory duty to identify sites within the LDP to satisfy housing need and demand. All proposed sites are subject to extensive consultation from a range of bodies and consideration must always be given to a range of policies including environmental and tourism matters. In the case of Tweeddale it is extremely difficult to find suitable housing land in Peebles (where there is a market interest) for a range of reasons thus the need to consider options further afield. Policies within the LDP, notably policy HD5 – Care and Nursing Homes is supportive of care</p>	<p>No action required</p> <p>No action required</p>
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		<p>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! <b>(216)</b></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</p>	<p>housing and lays down criteria tests for determining such applications, emphasising the amenity / facility / locational needs of residents. The delivery, financing etc of, for example, care / nursing homes facilities largely outwith the scope of the planning system. It should be noted that in relation to LDP policy ED7 Business, Tourism and Leisure Development in the Countryside, that policy aims to allow for appropriate employment generating development in the countryside whilst protecting the environment and to ensure that business, tourism and leisure related developments are appropriate to their location. It is not considered that any of the potential sites identified within the MIR is contrary to that policy. Appendix 3 of the LDP confirms the requirement for electric vehicle charging points. It is intended that the Council will produce Supplementary Planning Guidance through the period of the LDP to establish requirements for sustainable transport. The SPG is likely to cover a range of subjects taking on board the findings of the Council's `Sustainable Development Committee`.</p> <p>The rural growth areas are the areas identified within the SDP for</p>	<p>No action required</p>
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		<p>all of Scottish Borders. There is a need for much greater flexibility outwith rural growth areas. <b>(264)</b></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. <b>(264)</b></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. <b>(265)</b></p> <p>The Borders needs development but the strategy</p>	<p>major strategic growth. However, this does not mean other areas should be ignored and the LDP continues to support development site opportunities outwith these areas where possible.</p> <p>It is considered the LDP adequately covers sustainability principles in line with national planning requirements. This is an ever changing and developing subject and the Council will continue to consider appropriate steps accordingly. The findings of the Councils Sustainable Development Committee will play a role in helping develop this matter.</p> <p>Comments noted. The planning system has a role to play promoting sustainability, although clearly the planning system alone cannot address the various parts of this extensive topic. It is considered the LDP adequately covers sustainability principles in line with national planning requirements. This is an ever changing and developing subject and the Council will continue to take appropriate steps accordingly. The findings of the Councils Sustainable Development Committee will play a role in helping develop this matter.</p> <p>The LDP identifies a number of</p>	<p>No further action, although the findings of the Sustainable Development Committee will develop a corporate approach to helping develop this matter further</p> <p>No further action, although the findings of the Sustainable Development Committee will develop a corporate approach to developing this matter further</p> <p>No action required</p>
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		<p>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. <b>(271)</b></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. Environmentally sustainable housing designs should be a given in any new build wherever the location. <b>(276)</b></p> <p>No I don't agree. The town (Peebles) is already bursting at the seams and everybody knows that. <b>(285)</b></p>	<p>housing allocations across the Scottish Borders to meet housing need. Finding land in the Peebles area is challenging for a range of reasons and so the Main Issues Report identified a number of options to be considered – it is not that these options are all proposed for the LDP. All infrastructure and environmental issues are addressed as part of the consultation process.</p> <p>The Council has a statutory duty to promote economic development opportunities and identify and allocate the estimated required housing land supply. The process is carried out in consultation with a wide range of bodies and consideration is also given to any perceived impacts on the environment and tourism. The MIR makes clear reference to the changing demographics and the LDP gives support and promotion to care housing. The LDP supports and promotes environmentally sustainable housing designs.</p> <p>Any development in Peebles would be subject to the agreement of relevant consultees re infrastructure.</p>	<p>No action required</p> <p>No action required</p>
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		<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. <b>(318)</b></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. <b>(318)</b></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</p>	<p>Comments noted. The planning process must consider and balance a range of often conflicting duties. There is a market interest in housing within Peebles although finding sites within the town is a major challenge. Consequently the LDP and MIR looked further afield to identify sites to satisfy the required housing land supply needed. No housing land in Eshiels is proposed within the LDP.</p> <p>The LDP identifies a number of housing allocations across the Scottish Borders to meet housing need. Finding land in the Peebles area is challenging for a range of reasons and so the Main Issues Report identified a number of options to be considered – it is not that these options are all proposed for the LDP.</p> <p>The LDP will continue to seek land for development within the corridors of the Borders railway. However, that does not mean that other areas should be ignored and the Council has a duty to consider land allocations for development where there is a developer and market</p>	<p>No action required</p> <p>No action required</p> <p>No action required</p>
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		<p>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. <b>(318)</b></p>	<p>interest. Peebles clearly is a town where such interest lies. Policy IS4 – Transport Development and Infrastructure makes reference to the Council’s commitment to upgrading a number of transport routes across the region including the A703.</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. <b>(7)</b></p> <p>At present the MIR has the following aims: - growing our economy; planning for housing; town centres; rural environment; built and natural heritage; &amp; sustainability and climate change. These are all strong aims to include in any plan,</p>	<p>Comments noted. Policy IS4 – Transport Development and Infrastructure identifies a number of proposed transport infrastructure improvements and links across the region including along the route of the A72. Work on the upgrading of Dirtpot corner at Cardrona has recently been completed.</p> <p>The Aims make reference to “maximise and promote the Scottish Borders tourism potential”. The promotion of tourism is a common theme throughout the LDP and</p>	<p>No action required</p> <p>No action required</p>



		<p>however I would suggest in addition we include: - Improve attraction of the Borders (tourism / accommodation); &amp; enhance transport links. <b>(24)</b></p> <p>Properties should be built on land that is already up for sale. <b>(27)</b></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>”. <b>(45)</b></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. <b>(93)</b></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</p>	<p>policy IS4 – Transport Development and Infrastructure makes reference to the Council’s commitment to upgrading transport routes across the region.</p> <p>Comments noted.</p> <p>Comments noted. The LDP encourages and identifies the economic development benefits of the railway. There also remains a requirement in the LDP to confirm the Council’s commitment to upgrade the road network.</p> <p>Comments noted, although proposals in the vicinity or in sight of a listed building will be dealt with on a case by case basis.</p> <p>Comments noted and it is agreed there are economic development opportunities within Eyemouth in respect of off shore wind farm production. This is referred to within the settlement profile of Eyemouth within volume 2 of the LDP. The Council continues to be very proactive in helping support</p>	<p>No action required</p> <p>No action required</p> <p>No action required</p> <p>No action required</p>
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		<p>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> <ul style="list-style-type: none"><li>• “Promote economic development opportunities at ports, harbours and other coastal locations, including those related to the offshore renewables industry.”</li></ul> <p>iv. In the spatial strategy as it relates to the Berwickshire RGA, amend the penultimate</p>	<p>economic development across the Scottish Borders including opportunities within Eyemouth.</p>	
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		<p>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.” <b>(109, 110)</b></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. <b>(109, 110)</b></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. <b>(119)</b></p> <p>The LPD2 should build in a specific requirement</p>	<p>Comments noted and it is agreed there are economic development opportunities within Eyemouth in respect of off shore wind farm production. This is referred to within the settlement profile of Eyemouth within volume 2 of the LDP. The Council continues to be very proactive in helping support economic development across the Scottish Borders including opportunities within Eyemouth.</p> <p>Health and wellbeing, the promotion of walk and cycling routes, protection of the environment, continued emphasis on placemaking and design principles continue to be main themes throughout the LDP which are addressed within relevant policies.</p> <p>Policies EP1, EP2 and EP3 of the</p>	<p>No action required</p> <p>No action required</p> <p>No action required</p>
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		<p>regarding preserving wildlife habitats, and preventing habitat pockets from become even more isolated. <b>(146)</b></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. <b>(150, 151)</b></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. <b>(164)</b></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. <b>(166)</b></p> <p>Broadly support aims. However, the area infrastructure must match the needs of the</p>	<p>LDP seek to ensure protection of a range of protected species and sites.</p> <p>It is confirmed a thorough consultation is carried out to ensure the necessary social and physical infrastructure as fully addressed.</p> <p>It is considered that within parts of the LDP and policy EP7 - Listed Buildings and EP9 - Conservation Areas the important role the built heritage has in contributing to a range of matters including good placemaking, regeneration, and attractive and sustainable communities.</p> <p>Consultations with relevant bodies are carried out for all development site options in order to ensure matters such as infrastructure, public facilities, educational requirements are correctly addressed.</p> <p>All site development options are fully consulted upon with a range of</p>	<p>No action required</p> <p>No action required</p> <p>No action required</p> <p>No action required</p>
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		<p>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. <b>(172)</b></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. <b>(173)</b></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 &amp; services. <b>(185)</b></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</p>	<p>bodies to identify and address and infrastructure issues. This is carried out at the outset. Any outstanding issues require to be agreed by the relevant body, e.g. Scottish water, SPA, Roads Planning before a scheme is implemented. LDP policy supports care homes provision although the planning system is not the main body to identify need and ensure adequate provision. Consideration to all proposals must include any perceived impacts on tourism.</p> <p>Comments noted. The Aims included reference to the need to “Protect and enhance the built and natural environment”.</p> <p>The LDP encourages incorporation of modern domestic sustainable technologies. The LDP does not propose any housing allocations in proximity to Glentress. All new housing allocations are subject to consultation and agreement with a number of relevant parties to ensure required infrastructure and servicing is put in place.</p> <p>It is considered the third aim reads correctly. The aims are high level and do not intend to cover in finite detail the very wide spectrum of</p>	<p>No action required</p> <p>No further action</p> <p>No action required</p>
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	<p>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</p>	<p>subject matters which fall within the planning remit. It is considered the aims stated are satisfactory and how these will be achieved are stated within the Plan within the various relevant planning policies. The Council's Supplementary Guidance on Renewable Energy 2016 confirms support for a wide range of typology types. The Council encourages the incorporation of more energy efficient new housing, much of which is addressed via the Building Standards process.</p>	
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		<p>design and technologies ought to be reducing the need for heating in new buildings to a minimum. <b>(196)</b></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"> <li>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</li> <li>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</li> <li>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. <b>(197)</b></li> </ol> <p>There needs to be a more holistic approach which</p>	<p>It is considered consultations carried out are done so in a satisfactory and correct manner allowing consultees to formally object or raise issue if they have reasons to believe a proposal could not be supported. The LDP does strike the challenging balance between satisfying housing land requirements, identifying sites and giving consideration and protection to the environment.</p> <p>Consultations with relevant bodies</p>	<p>No action required</p> <p>No action required</p>
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		<p>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. <b>(201)</b></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"> <li>• 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.</li> <li>• The Sustainability aim to “Encourage better connectivity” could be expanded on. We are unclear on what this encompasses.</li> <li>• 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 maintain would more clearly highlight that there is a positive existing resource</li> </ul>	<p>ensure infrastructure issues are identified and addressed. There is a need to identify land for development to meet demand. It is not possible to achieve this without some impacts. Many potential sites have a number of constraints some of which cannot be overcome. Regardless of which sites are chosen it is most likely there will be neighbouring objections to them.</p> <p>Comments noted although it is considered the text referred to within the Aims is appropriate.</p>	<p>No action required</p>
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		<p>in the Scottish Borders. <b>(213)</b></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. <b>(218)</b></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. <b>(220)</b></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"> <li>* 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</li> <li>* Transport - major investment needs to be made</li> </ul>	<p>It is considered the aim with regards to the built and natural heritage is worded in a fair and sensible manner which is implemented well in practice. The Council will consider further the matter of a National Park within the Scottish Borders.</p> <p>The aims of the LDP seek to implement the vision and the aims make reference to required services and infrastructure to be carried out. How health and social care services are maintained is outwith the scope of the LDP</p> <p>Education Dept are consulted upon new development options in order that they can comment and take appropriate action if necessary if a school is reaching capacity. The Council continues to identify and implement schemes to upgrade its roads and the LDP continues to support the extension of the railway</p>	<p>No action required at this stage, although the Council will consider further the matter of a National Park within the Scottish Borders</p> <p>No action required</p> <p>No action required</p>
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		<p>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. <b>(221)</b></p> <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. <b>(222)</b></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. <b>(234)</b></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 infrastructure - there seems to be an assumption that this is part of the</p>	<p>line from Tweedbank to Carlisle. The LDP can only do so much to encourage firms to set up within the Scottish Borders. It is hoped external funding from the likes of the new SOSEP can help set up serviced business land and buildings for firms to set up.</p> <p>The Council is well aware of the need to find business land in Peebles. However, due to a range of constraints this is extremely challenging and therefore the area of search has extended outwith the town. At present there are no plans to build a new railway line linking Edinburgh and Peebles.</p> <p>Comments noted.</p> <p>There is a statutory requirement to find housing land and consideration has to be given to where it is most effective and with market interest. Peebles is such an area and all proposed sites have been subject to</p>	<p>No current action required although future transport links will continue to be monitored</p> <p>No action required</p> <p>No action required</p>
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		<p>Edinburgh plan but 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. <b>(243)</b></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.</p>	<p>extensive consultation and scrutiny by a range of bodies including ensuring infrastructure issues are addressed and will be satisfactory if and when development commences. There are currently no plans to form a railway link between Peebles and Edinburgh. The development of brownfield sites continue to be promoted in the LDP, although in many cases potential development costs, site clearance, contamination issues impact on delivery. Policy IS4 confirms the Council's commitment to upgrading the A72 and A703.</p> <p>Policy IS10 Waste Management Facilities confirms support and reference for the Zero Waste Plan which includes recycling targets. The Council has a duty to support renewable energy proposals including wind turbines where appropriate, although clearly consideration must continue to be given to any potential impacts on the landscape and environment.</p>	<p>No further action</p>
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		<p><b>(243)</b></p> <p>Broadband requires to be upgraded in the Newcastleton area. <b>(245)</b></p> <p>Agree with the aims but not the methods. <b>(246)</b></p> <p>Build infrastructure before or at the same time as houses. <b>(247)</b></p> <p>Agree but no more housing is needed in Peebles. <b>(248)</b></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. <b>(250)</b></p>	<p>Comments noted.</p> <p>Comments noted.</p> <p>Agree. This practice will continue.</p> <p>There remains market interest in Peebles which the Council cannot ignore in preparing its LDP.</p> <p>The consultation on all potential development sites involves input from a range of bodies including Education, NHS, Scottish Water, SEPA and Roads Planning. The LDP supports provision of affordable housing.</p>	<p>The Council will continue to promote improved broadband across the region</p> <p>No action required</p> <p>The Council will continue to liaise with relevant parties to ensure adequate infrastructure provision for new developments</p> <p>No action required</p> <p>No action required</p>
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		<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. <b>(251)</b></p> <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. <b>(252)</b></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. <b>(258)</b></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. <b>(258)</b></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. <b>(258)</b></p>	<p>Comments noted, although the Council cannot ignore the fact it has a statutory duty to provide a generous supply of housing.</p> <p>The LDP continues to support development in the Galashiels / Tweedbank corridor. However, it should not ignore other parts of the Scottish Borders particularly Peebles which is a recognised growth area, there is a market interest and housing development brings many economic benefits to the town.</p> <p>Comments noted. The Council continues to liaise with the respondents working group to explore renewable energy opportunities on Common Good land.</p> <p>The Selkirk bypass is outwith the remit of the Council.</p> <p>Comments noted.</p>	<p>No action required</p> <p>No action required</p> <p>No action required</p> <p>No action required</p> <p>No action required</p>
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		<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. <b>(258)</b></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. <b>(260)</b></p> <p>Support, but it must support a range of enterprises especially locally owned SME businesses. <b>(272)</b></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</p>	<p>Do not quite understand the comments. In terms of wind farms the respondent must be aware of the need to balance the support for renewable energy against the protection of the landscape and environment around Selkirk.</p> <p>LDP policies re Housing in the Countryside and Business, Tourism and Leisure Development in the Countryside confirm the Council's support to these matters where appropriate. In terms of farm diversification the latter policy appreciates potential Brexit issues for rural land owners and gives added weight to the economic development aspects of such proposals. Responsible behaviour in the countryside is outwith the remit of the LDP.</p> <p>Comments noted.</p> <p>Sustainability covers a wide range of matters and it is considered the LDP gives wide reference and</p>	<p>No action required</p> <p>No action required</p> <p>No action required</p> <p>No action required</p>
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		<p>building sustainable communities should in my view include a concept of what sustainable means - this isn't just environmental sustainability so it is left dependent on definitions which are absent. <b>(277)</b></p> <p>Support, however, with regards to Growing the Economy - promoting economic development opportunities along the railway corridor subject to -  (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. <b>(288)</b></p> <p>Mainly agree, but the area falls sort of many beautiful areas. <b>(297)</b></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 &amp; 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? <b>(298)</b></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</p>	<p>support to these matters.</p> <p>Comments noted. The Borders Transport Corridors Study identifies a number of options. One of the aspirations was promotion of railway link from St Boswells to Berwickshire. LDP acknowledges this in para 2.13 of vol 1 although clearly further work is required to develop this. All former railway routes are safeguarded under policy EP12</p> <p>Comments noted.</p> <p>The LDP proposes development across the Scottish Borders and recognises the opportunities and benefits within the locations referred to. Peebles is a town with a proven market interest and the Council cannot disregard this in its efforts to identify effective development sites.</p> <p>The LDP identifies sites for development across the whole of the Scottish Borders and supports broadband</p>	<p>No action required at this point in time</p> <p>No action required</p> <p>No action required</p> <p>No action required</p>
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		<p>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. <b>(315)</b></p> <p>Two very important Aims that have not been included in the MIR. These are:  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. <b>(90)</b></p> <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 and any supporting</p>	<p>The LDP makes regular references to the need for service provision/ infrastructure and a further aim was added which has been added making reference to infrastructure provision. Policies within the LDP, notably policy HD5 – Care and Nursing Homes is supportive of care housing and lays down criteria tests for determining such applications, emphasising the amenity / facility / locational needs of residents. The delivery, financing etc of, for example, care / nursing homes facilities largely outwith the scope of the planning system.</p> <p>The Council has set up a Sustainable Development Committee to ensure corporate approach to achieving Scottish Govt climate change targets. A Supplementary Planning Guidance on Sustainability and Climate</p>	<p>A further aim has been added requiring reference to the provision of adequate infrastructure</p> <p>A Supplementary Planning Guidance on Sustainability and Climate Change is proposed to be produced in due</p>
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		<p>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. <b>(99)</b></p>	<p>Change is proposed be produced in due course to help identify and address how the planning process can help achieve the delivery of the targets. The LDP makes reference to this, including in Appendix 3.</p>	<p>course to help identify and address how the planning process can help achieve the delivery of the targets. The LDP makes reference to this</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. <b>(45)</b></p> <p>The economic development opportunities afforded by the Borders Railway should be reflected by the housing, economic development, sustainability and regeneration LDP policies. <b>(45)</b></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.  <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</i></p>	<p>Comments noted. The LDP promotes public transport and the opportunities the Borders railway provides.</p> <p>The LDP promotes the opportunities the Borders railway provides including through a range of planning policies.</p> <p>Sustainable growth covers a multitude of subjects and there are no hard statistics available which it is believed the respondent is seeking which break down various benefits from e.g housing devs, business land implementation, Borders rail etc. The planning system has no control over where individuals decide to live and work, but by allocating and creating attractive and ready available business buildings and sites in the Scottish Borders is more likely to attract purchasers to live and work in a particular areas without the</p>	<p>No action required</p> <p>No action required</p>

		<p>place near where they work. <i>Does this mean that potential commuters from say Peebles to Edinburgh will be discouraged from moving to Peebles and encouraged to remain in Edinburgh?</i> A series of cross boundary transport projects have made travel by public transport easier and more people are cycling and walking to work. <i>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”?</i> 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”. <b>(73)</b></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. <b>(96)</b></p> <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</p>	<p>need for longer distance travel. The LDP has no remit in ensuring the upgrading of public transport although it continues to identify and promote the role public transport has in sustainable travel. The Council continues to promote and implement new cycle routes such as Peebles – eastwards. New cycling and walkways are considered as part of new build planning applications.</p> <p>The LDP cannot resolve and control all private business aspirations. Many larger companies seek to be based where population densities and customers are closer at hand.</p> <p>In considering potential sites for development extensive consultations are carried out including the seeking of comments from Scottish Water, NHS, SEPA, Education and Roads Planning. The LDP promotes the use of sustainable building design and materials. The planning process must address a series of often conflicting roles e.g. identifying development sites / supporting rural economy / protecting the</p>	<p>No action required</p> <p>No action required</p>
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		<p>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. <b>(155)</b></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. <b>(160)</b></p> <p>Agree in general, but we have grave concerns over the proposed preferred development site in Innerleithen adjacent to the health centre <b>(162)</b></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</p>	<p>environment and tourism. Appendix 3 of the LDP confirms the requirement for electric vehicle charging points for new developments. It is intended that the Council will produce Supplementary Planning Guidance through the period of the LDP to establish requirements for sustainable transport. The SPG is likely to cover a range of subjects taking on board the findings of the Council's 'Sustainable Development Committee'.</p> <p>The LDP has clear policies in place e.g the Environmental Protection and Promotion policies, but also lays down criteria tests for promoting development in the countryside, e.g HD2, ED7</p> <p>Concerns noted. However, it is considered the site in question is appropriate for development within the LDP.</p> <p>Comments noted. The Council welcomes the submission for any sites for consideration in the Plan. It is believed the site the respondent is referring to has previously been considered and excluded for</p>	<p>No action required</p> <p>The site in Innerleithen referred to is included in the LDP for mixed use development</p> <p>No action required</p>
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		<p>client's site at Dingleton Mains, Melrose. This site is effective and can be delivered within the short term. <b>(177)</b></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. 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</p>	<p>inclusion.</p> <p>Policy ED7 supports rural business and diversification and gives added weight to the consideration of economic benefit matters. The Land Use Strategy promotes a wide range of rural actions and safeguards and is referred to within the LDP. The Council promotes a wide range of new woodland planting via the Scottish Borders Woodland Strategy and Woodland Creation Advice Note. As part of the Woodland Strategy the Council is currently taking part in a Regional Woodland Creation Pilot Scheme as referred in the introductory text to policy EP13. The aim of the project is to develop a new approach to forestry that seeks better integration of new woodland with farming and other land uses to maximise the benefits.</p>	<p>No action required</p>
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		<p>the 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. <b>(199)</b></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. <b>(219)</b></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,</p>	<p>Site ref AGREE009 has been allocated for housing development in the LDP. The LDP continues to support the development of brownfield sites.</p> <p>The site in Tweedbank referred to (assumed Lowood ref MTWEE002) is allocated in the LDP via the SG on Housing and has been signed off by Scottish Ministers. The site has a number of advantages over other sites considered for the LDP. For example, it is within a central</p>	<p>No action required. AGREE009 is included within the LDP</p> <p>No action required</p>
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		<p>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. <b>(222)</b></p> <p>Support the aims, but it is another level of bureaucracy and cost for limited, if any, benefit. <b>(241)</b></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. <b>(244)</b></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 and natural</p>	<p>location in a well established housing market area, the high quality surrounding landscape offers excellent development opportunity, it is located next to the Tweedbank railway terminal and is in keeping with the railway blueprint to promote economic development opportunities along the railway corridors. Extensive consultations in the preparation of an SPG to develop the site has identified mitigation measures to address all potential constraints. It is considered the site will be extremely attractive for a range of developers and house purchasers.</p> <p>Comments noted.</p> <p>Comments noted. The site at Eckford identified in the MIR has not been carried forward into the LDP.</p> <p>Comments noted.</p>	<p>No action required</p> <p>No action required</p> <p>No action required</p>
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		<p>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. <b>(261)</b></p> <p>The gap sites should be built on before any large development are considered. <b>(275)</b></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": <b>(277)</b></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</p>	<p>The LDP allows infill development where appropriate.</p> <p>Comments noted. It is considered the LDP does identify opportunities and allocations on the back of the matters mentioned. Longer term sites are identified to give an indication how settlements may develop in the future. These are not formal allocations but can be brought forward should it be confirmed that there is a housing shortfall within the LDP period.</p> <p>Comments noted. The LDP gives protection to a wide range of green spaces and the Council promotes a wide range of new woodland planting via the Scottish Borders</p>	<p>No action required</p> <p>No action required</p> <p>No action required</p>
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		<p>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. <b>(289)</b></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</p>	<p>Woodland Strategy and Woodland Creation Advice Note. As part of the Woodland Strategy the Council is currently taking part in a Regional Woodland Creation Pilot Scheme as referred in the introductory text to policy EP13. The aim of the project is to develop a new approach to forestry that seeks better integration of new woodland with farming and other land uses to maximise the benefits. The LDP allows a much greater range of uses within its town centres (see policies ED3 and ED4) and requires a sequential test to be carried out when considering out of town centre developments and the impacts they may have on town centres.</p> <p>The Council has considered a wide range of site options across the region and has carried out extensive consultations with a range of bodies to identify any potential issues to be addressed and mitigated against where required and possible. Consultations have included Scottish Water, SEPA, Education, Roads Planning and NHS. Peebles is a town with a well established housing market interest and demand and the Council cannot</p>	<p>No action required</p>
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		<p>and social regeneration following the closure of Mills and other heavy industry. <b>(292)</b></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</p>	<p>ignore this. Sites must be identified where there is such interest. If sites were allocated where there was no or limited interest then the development industry would understandably state such sites were not effective and the Council's claimed land supply was flawed. Substantial land is allocated in Galashiels, Hawick and Innerleithen.</p> <p>Policies within the Environmental Promotion and Protection section confirm the protection of the built and natural heritage. However, the planning system often has duties to address and promote conflicting issues and the national requirement to support wind farms must be weighed up against any adverse impact on the landscape and the environment. The Council consequently supports and rejects such proposals as they feel is appropriate. The matter of the support or otherwise of a national park within the Scottish Borders will be debated by the Council in due course. The Council supports a wide range of renewable energy types in appropriate locations.</p>	<p>No action required</p>
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		<p>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. <b>(152)</b></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</p>	<p>It is considered the reference to Rural Environment is an appropriate phrase. The LDP supports development across the Region not just the railway corridor and policy ED7 for example gives support to</p>	<p>No action required</p>
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		<p>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. <b>(195)</b></p> <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. <b>(295)</b></p> <p>Galashiels and Melrose get priority over other areas and the Borders should be thought of as a whole. <b>(297)</b></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</p>	<p>rural business developments and tourism.</p> <p>Comments noted, although the Aims do make clear reference to encouraging better connectivity by transport and improve digital connectivity.</p> <p>It is considered the LDP identifies a range of opportunities and allocations across the Scottish Borders.</p> <p>The LDP continues to identify and support the Selkirk by pass although the final decision on its delivery is ouwith the Council’s control. The LDP also continues to support and promote the railway line extension south to Carlisle. Funding is clearly an issue re CPO of brownfield / derelict sites. Policy IS4 confirms the Council’s commitment to improvements to the A72. Further work requires to be done in relation to dark skies in terms of where and when it will be designated and what</p>	<p>No action required</p> <p>No action required</p> <p>No action required</p>
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		<p>policy outlined in the proposed document will endorse the need for</p> <ul style="list-style-type: none"> <li>• a future Selkirk By-pass to improve connectivity and that</li> <li>• inclusion of a potential rail extension south could provide both regional and national benefits.</li> </ul> <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"> <li>• 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</li> <li>• A72 road corridor requires radical improvement to assist development growth and associated communication links</li> <li>• Pursuance of a ‘Dark Sky’ initiative for the Borders. <b>(305)</b></li> </ul> <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. <b>(318)</b></p>	<p>the implications and controls are from a planning point of view.</p> <p>Policy IS4 gives examples of the wide range of transport proposals and improvements to be carried out. Development opportunities and land allocations take on board these works.</p>	<p>No action required</p>
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		<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. <b>(70)</b></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 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. <b>(70)</b></p> <p>TS will continue to engage as this appraisal progresses and with the Borderlands Initiative and the Edinburgh and Lothians City Regional Deal. <b>(70)</b></p> <p>TS welcome the MIR stating there is a need to reduce travel and extend and improve green network opportunities and links. Sustainable,</p>	<p>Comments noted.</p> <p>Comments noted. Transport Scotland will be consulted on the proposed LDP and Transport Scotland’s assistance in working together is appreciated.</p> <p>Comments noted and appreciated.</p> <p>Support noted.</p>	<p>No action required</p> <p>No action required</p> <p>No action required</p> <p>No action required</p>
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		active travel options should be an integral part of an LDP, as well as, encouraging better connectivity. <b>(70)</b>		
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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	Proposed Response to Main Issues Raised	Recommendation
Growing our 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. <b>(73)</b>	Comments noted. The sites proposed for business and industrial allocations have come forward as a result of detailed discussions with the Economic Development Section of the Council. Furthermore, undertakes an annual Employment Land Audit which monitors the supply, take-up and status of business and industrial land within the Scottish Borders in accordance with Scottish Planning Policy. The audit assesses the range and choice of the sites which make up the supply. The audit also identifies the availability and constraints of sites and also monitors windfall employment developments.	No action required.
Growing our 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. <b>(7)</b>	Comments noted.	No action required.
Growing our 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	The Proposed Local Development Plan will present the wording of Policy ED1 which seeks to protect land for business and industrial purposes but also promote complimentary uses. It is	It is recommended that the Council agrees to carry the Preferred Option for Policy ED1: Business and



		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. <b>(7)</b>	considered that the proposed wording addresses the concerns raised.	Industrial Land forward into the Proposed LDP.
Growing our 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. <b>(24)</b>	Comments noted.	No action required.
Growing our economy: Question 2	Agree with preferred option	The contributor agrees although it is unclear which option he agrees with. <b>(25)</b>	Comments noted.	It is recommended that the Council agrees to carry the Preferred Option for Policy ED1: Business and Industrial Land forward into the Proposed LDP.
Growing our economy: Question 2	General	The contributor considers that building on farm land will deter future farming. <b>(27)</b>	It is not considered that the development of farm land indicated within the forthcoming Proposed LDP would be significant enough to deter future farming within the vicinity.	No action required.
Growing our 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. <b>(56)</b>	Support for preferred option noted.	It is recommended that the Council agrees to carry the Preferred Option for Policy ED1: Business and Industrial Land forward into the Proposed LDP.
Growing our	Disagrees with	The contributor does not agree with the preferred	Comments noted.	It is recommended

economy: Question 2	preferred and alternative options	or alternative options. <b>(95)</b>		that the Council agrees to carry the Preferred Option for Policy ED1: Business and Industrial Land forward into the Proposed LDP.
Growing our 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. <b>(96)</b>	'Bad neighbour development' now falls under Schedule 3 classes of development within the Development Management regulations. Any potential impacts upon neighbouring land uses will be given due consideration through the Development Management process in consultation with the Scottish Environment Protection Agency (SEPA) and the Council's Environmental Health Officers.	No action required.
Growing our 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. <b>(109, 110)</b></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</p>	<p>Comments noted. There are currently a mixture of uses at and around Eyemouth Harbour. There is also an allocated mixed use site within close proximity at Gunsgreen (MEYEM001) as well as business and industrial sites within the town (BEYEM001 and zEL6). A Planning Brief was prepared for a significant part of Harbour Road in 2014, which seeks to guide future redevelopment.</p> <p>It is agreed that there has been a change in context at Eyemouth over recent years in that there is now the opportunity for the town to offer a</p>	It is recommended that the Council agrees to include the following wording within the Vision, Aims and Spatial Strategy section of the Proposed LDP in respect of the Eastern Spatial Strategy and also within the Eyemouth settlement profile: <i>'The coastal economy at</i>

		<p>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&amp;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. <b>(109, 110)</b></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 local and regional significance to a range of industries,</p>	<p>key location for emerging offshore renewable energy projects.</p> <p>It is agreed that the coastal economy is important to Eyemouth and that reference should be made to the aforesaid opportunities associated with the emerging offshore renewable industry. This should be incorporated within the Vision, Aims and Spatial Strategy section of the Proposed LDP in respect of the Eastern Spatial Strategy and also within Volume 1 and the Eyemouth settlement profile, as follows: <i>‘The coastal economy at Eyemouth is important to the local area. There has been a change in context at Eyemouth over recent years in that there is now the opportunity for the town to offer a key location for emerging offshore renewable energy projects’.</i></p> <p>The site referred to at Gunsgreen is a mixed use site and would not therefore be assessed against Policy ED1: Business and Industrial Land.</p>	<p><i>Eyemouth is important to the local area. There has been a change in context at Eyemouth over recent years in that there is now the opportunity for the town to offer a key location for emerging offshore renewable energy projects’.</i></p>
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		potentially including the offshore renewables sector. <b>(110)</b>		
Growing our 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. <b>(111)</b>	The Council continues to allocate sites for mixed use development. A sequential test is considered necessary in respect of the safeguarding of business and industrial sites in order to ensure there is not a dilution of these sites to other uses which could have been accommodated elsewhere in a settlement.	No action required.
Growing our 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 <a href="#">SEPA Flood Risk and Land Use Vulnerability Guidance</a> . 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. <b>(119)</b>	Comments noted. SEPA would be consulted during the process of any planning application(s) which are located within sites which are at flood risk.	Comments noted.
Growing our 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. <b>(151)</b>	Comments noted. The Council would agree that there are existing empty business premises in the Scottish Borders and would actively encourage their reuse. However, it must be acknowledged that in some cases businesses require purpose built buildings to suit the functionality of their operations and	No action required.

			it is not always viable to occupy buildings which are not fit for purpose.	
Growing our 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. <b>(156)</b>	Comments noted. From a planning allocation point of view, it is the principle of development that is assessed, not the scale of the housebuilder.	No action required.
Growing our 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. <b>(171, 230, 262, 263, 273, 290, 292, 294, 299)</b>	Support for preferred option noted.	No action required.
Growing our economy: Question 2	Agree with preferred option	Scottish Land and Estates are of the view that the preferred option represents the most flexible alternative 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. <b>(195)</b>	Support for preferred option noted.	No action required.
Growing our economy: Question 2	General	The Southern Uplands Partnership suggest that maximum flexibility would be beneficial. <b>(196)</b>	Comments noted. Maximum flexibility would enable the development of business and industrial sites for a multitude of uses. This would result in the dilution of business and industrial sites which must be safeguarded in order to facilitate employment opportunities, economic activity and	No action required.

			economic growth.	
Growing our 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. <b>(203)</b>	Comments noted. The Blueprint for the Border Railway seeks to ensure economic development opportunities are maximised along the railway corridor. The LDP must seek to identify and promote these opportunities by allocating land within the vicinity of the Railway.	No action required.
Growing our 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. <b>(206)</b>	Comments and support for preferred option noted.	No action required.
Growing our economy: Question 2	Agree with alternative option 3	The contributor does not consider the argument for changing policy has been strongly made. <b>(209)</b>	Comments noted. However, Officers considered it necessary to review Policy ED1 due to some issues in practice.	No action required.
Growing our 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. <b>(214, 288, 315)</b>	Comments and support for Alternative Option 1 noted.	No action required.
Growing our 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 any site within Greenlaw would not extend to a large business park. <b>(215)</b>	The Council has established through liaison with the Council's Economic Development Section that there is demand within Greenlaw for business and industrial land and has as a result proposed a 1.2ha site to the south of Edinburgh Road. It is considered that this site should be carried forward into the Proposed LDP. The contributor's comments in respect of the policy approach are noted. It is considered that the	No action required.

			preferred option, with the categorisation of the aforesaid site as a 'business and industrial category' would allow for class 4, 5 and 6 uses at this location.	
Growing our 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. <b>(216)</b>	Comments and support for the preferred and alternative option 2 noted. In this instance, the Council considers that the preferred option should be carried forward into the Proposed LDP. The Council would agree with the comments made in respect of business and industrial land across the Borders.	No action required.
Growing our 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. <b>(222)</b>	Comments noted. It is not always possible for former business and industrial buildings to continue under their former uses. Older industrial buildings are not generally fit for purpose as the way businesses operate has changed over time. A number of former industrial buildings are listed buildings and allowing alternative uses does encourage their reuse and therefore their protection. Not all allocated sites are for residential development. The Plan allocates sites for business and industrial, mixed use, education and redevelopment purposes.	No action required.

Growing our economy: Question 2	General	The contributor requires clarification on the first sentence. <b>(231)</b>	The Council is unsure of the issue identified and consider the text referred to appropriate.	No action required.
Growing our 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. <b>(23)</b>	<p>The Main Issues Report (MIR) recognises that the built and natural heritage are major component parts of the attractiveness of the Scottish Borders which must be protected and enhanced. There are a large number of listed buildings, conservation areas, landscape and biodiversity designations and opportunities must continue to be explored to capitalise on these assets in the interests of tourism and economic development. It is acknowledged that the Plan 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.</p> <p>It is not considered that development at this location would result in ribbon development or coalescence of the settlements within the Tweed Valley.</p> <p>In light of the consultation responses received during the Main Issues Report public consultation and following further investigation on site MESH1001 as well as taking</p>	It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced business site - BESH1001 at this location.



			into account the immediate need to identify land for employment use, it is recommended that a reduced site for employment only – site BSHI001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.	
Growing our 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. <b>(256)</b>	Whilst new settlements offer positive opportunities for appropriate siting and design, infrastructure is often not readily available and cost prohibitive. It is accepted that this is an option which may have to be assessed in future Local Development Plans.	No action required.
Growing our 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. <b>(258)</b>	Comments noted. In assessing the suitability of sites for development, due consideration must be given to the landscape impact. Development must address the balance of economic development versus environmental protection.	No action required.
Growing our 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	Policy ED1: Business and Industrial Land applies to all business development on business and	No action required.

		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. <b>(260)</b>	industrial land across the Scottish Borders.	
Growing our 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. <b>(272)</b>	Comments noted and agreed. This is an aspect that is now rightly being considered more through the preparation of Local Development Plans. Health and wellbeing is encouraged through, for example, the protection of greenspace, better connectivity and the extension and improvement of green network opportunities and links.	Comments noted and agreed.
Growing our 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. <b>(274, 276)</b>	Support of alternative option 3 noted. However, it is considered the current policy has issues in practice and requires amending.	It is recommended that the Council agrees to carry the Preferred Option for Policy ED1: Business and Industrial Land forward into the Proposed LDP.
Growing our 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). <b>(277)</b>	Support of the preferred option 1 or alternative option 3 is noted. However, it is considered the current policy has issues in practice and requires amending.	It is recommended that the Council agrees to carry the Preferred Option for Policy ED1: Business and Industrial Land forward into the Proposed LDP.

Growing our 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 businesses. <b>(283)</b>	Comments noted. It is proposed that Policy ED1 will rigorously safeguard high amenity business sites for Class 4 uses, however, the policy will recognise that there may be circumstances whereby, in the case of high amenity business sites, high quality commercial activity may be acceptable as well as non-industrial business / employment generating uses if it enhances the quality of the business park as an employment location.	It is recommended that the Council agrees to carry the Preferred Option for Policy ED1: Business and Industrial Land forward into the Proposed LDP.
Growing our economy: Question 2	General	The contributor is of the view that Newcastleton should be included as a rural development area. <b>(287)</b>	Comments noted. The boundaries of Rural Growth Areas are determined at a strategic plan level. The role of Newcastleton is, however, recognised within the Local Development Plan within the rural area it serves.	No action required.
Growing our economy: Question 2	Agree with alternative option 2	The contributor supports Alternative Option 2. <b>(289)</b>	Support of Alternative Option 2 is noted. However, it is considered the current policy has issues in practice and Option 1 is considered the most appropriate option.	It is recommended that the Council agrees to carry the Preferred Option for Policy ED1: Business and Industrial Land forward into the Proposed LDP.
Growing our economy: Question 2	General	Strategic High Amenity business requires high speed broadband connectivity, meaning gigabit and beyond, not 24 mbps. <b>(295)</b>	Comment noted. The Local Development Plan will continue to encourage and promote improved digital connectivity as a priority for the Council.	No action required.
Growing our economy:	General	The contributor considers that the whole of the Borders should be included. <b>(297)</b>	Unfortunately it is unclear what this comment refers to. The Local	No action required.

Question 2			Development Plan covers the whole of the Scottish Borders.	
Growing our 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. <b>(305)</b>	Comments noted. The Council would agree that the degree of retail and leisure/hotel elements must be considered carefully. It is considered that the wording of Policy ED1: Protection of Business and Industrial Land enables these matters to be fully judged through the process of any planning application.	No action required.
Growing our 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? <b>(312)</b>	Support for the preferred option is noted. It is considered that the proposed wording for Policy ED1: Protection of Business and Industrial Land suitably addresses these comments. The Council promotes the safeguarding and provision of appropriate business and industrial land in order to attract business and investment to the area.	It is recommended that the Council agrees to carry the Preferred Option for Policy ED1: Business and Industrial Land forward into the Proposed LDP.
Growing our 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. <b>(318)</b>	Support for alternative option 2 noted. It is considered that the proposed wording as stated in Option 1 for Policy ED1: Protection of Business and Industrial Land suitably addresses these comments.	It is recommended that the Council agrees to carry the Preferred Option for Policy ED1: Business and Industrial Land forward into the Proposed LDP.
Growing our 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	Comments noted. It is considered that the two categories proposed within Policy ED1 offer a degree of	It is recommended that the Council agrees to carry the

		<p>&amp; 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. <b>(321)</b></p>	<p>required flexibility. It is considered there are some practical issues in implementing the current 4 category approach.</p>	<p>Preferred Option for Policy ED1: Business and Industrial Land forward into the Proposed LDP.</p>
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### 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?

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Main Issue	Sub Issue	Summary of Main Issues Raised	Proposed Response to Main Issues Raised	Recommendation
Growing our 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. <b>(23, 185, 229, 252, 261, 276)</b>	Comments noted. It is agreed that there is a focus on maximising economic development opportunities along the railway corridor. This is set out in the Borders Railway 'Maximising the Impact: A Blueprint for the Future' (November 2014). It is also important, however, that there is generally a sufficient supply of business land across the Scottish Borders and a shortfall has been identified within the Peebles area.	No action required.
Growing our 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. <b>(23)</b>	Comments noted and agreed. It is agreed that there is a lack of suitable business and industrial land in Galashiels. The Council has identified potential business and industrial land at Winston Road in Galashiels. Furthermore, land within the site at Lowood, already a mixed use allocation within the Local Development Plan 2016, will incorporate a degree of business land to meet this shortfall.	No action required.
Growing our economy: Question 3	General	Strategically placed in the areas with the highest unemployment and deprivation. <b>(25)</b>	Comments noted. The sites allocated for business and industrial use are predominantly located within or adjacent to settlements	No action required.

			across the Borders where there is a recognised demand.	
Growing our 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? <b>(27)</b>	It is not the intention of the Council to allow development to have a negative impact upon agricultural activities across the Scottish Borders. The LDP recognises potential impacts of Brexit and consequent issues for rural landowners and promotes diversification within Policy ED7 – Business, tourism and leisure development in the countryside gives added weight to economic benefits.	No action required.
Growing our 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. <b>(90)</b>	The Council is currently in the process of investigating appropriate sites for a care home in the Central Borders and this site is being considered.	No action required.
Growing our 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. <b>(175)</b>	Comments noted.	No action required.
Growing our economy: Question 3	General & 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. <b>(136)</b>	This site was submitted for consideration during the MIR consultation. The site assessment concluded the following:  <i>'Whilst the principle of business land at this location is considered to be acceptable, there is already a substantial area of land designated for business use within the Local</i>	It is recommended that the Council agrees not to allocate this site (BNEWT002) within the Proposed Local Development Plan.



			<p><i>Development Plan 2016 (BNEWT001) to the immediate north of the site. Furthermore, any development of this site would be limited by the area that would be required for the provision of a roundabout required as part of the Newtown St. Boswells Development Framework.</i></p> <p><i>The site is located within the Countryside Around Towns area as defined by Policy EP6. It is not however considered that the development of this site would have an unacceptable harm on the neighbouring settlements due to the proximity of existing sites earmarked for development.</i></p> <p><i>There is a high voltage electricity cable running across the site which would require to be relocated and it is understood there is waste material under the site which may make construction more expensive. These matters would require to be considered as part of any development.</i></p> <p><i>Due to the proximity of the site to existing residential properties and the potential conflict of uses, use classes 5 or 6 may be difficult to support from an Environmental Health point of view. There is no Waste Water Treatment Works to</i></p>	
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			<p><i>serve any development at this location.</i></p> <p><i>It is considered that given the extensive existing business allocation at Tweed Horizons (BNEWT001) and the potential issue of any development on this site interfering with any future roundabout required as part of the Newtown St. Boswells Development Framework that this site is not currently appropriate for development. It is not considered that the submission has justified the need for business land at this location.'</i></p>	
Growing our 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. <b>(137)</b>	Comments noted. Supplementary Guidance and a Simplified Planning Zone is now in place for the existing business and industrial land at Tweedbank. This does identify small clusters of land which would be developable. There will be opportunities within the former Lowood Estate for small scale studios etc.	No action required.
Growing our 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 <b>(150, 172, 276)</b> . Also, at Walkerburn. <b>(150, 172)</b> and Innerleithen. <b>(292)</b>	Comments noted. It is agreed that there is a focus on maximising economic development opportunities along the railway corridor. This is set out in the Borders Railway 'Maximising the Impact: A Blueprint for the Future' (November 2014). It is also important, however, that there is a sufficient supply of business land	No action required.

			<p>across the Scottish Borders and a shortfall has been identified within the Peebles area. Business and Industrial sites are identified in Eshiels and Innerleithen. Redevelopment and mixed use sites are identified within Walkerburn and Reston.</p>	
<p>Growing our economy: Question 3</p>	<p>General - Walkerburn</p>	<p>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. <b>(185, 223)</b></p>	<p>It is important that there is a sufficient supply of business land across the Scottish Borders and a shortfall has been identified within the Peebles area. Business and Industrial sites are identified in Eshiels and Innerleithen. A redevelopment site is identified in Walkerburn which could potentially be utilised for business/industrial purposes.</p>	<p>No action required.</p>
<p>Growing our economy: Question 3</p>	<p>General – Innerleithen and Walkerburn</p>	<p>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. <b>(239)</b></p>	<p>It is important that there is a sufficient supply of business and industrial land across the Scottish Borders and a shortfall has been identified within the Tweeddale area. Sites are allocated where there is an identified need through consultation with the Council's Economic Development section. The sites identified are considered to be suitable from an infrastructure point of view. A business and industrial site is identified in Innerleithen and there are opportunities at Caerlee Mill. A redevelopment site in Walkerburn could potentially accommodate business/industrial development.</p>	<p>No action required.</p>

<p>Growing our economy: Question 3</p>	<p>General – Borders / Reston / Eddleston / Walkerburn</p>	<ul style="list-style-type: none"> <li>• 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; <b>(155, 186, 188, 197, 207, 239, 241)</b></li> <li>• 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. <b>(155, 206)</b></li> <li>• 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. <b>(155, 206)</b></li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted. It is agreed that there is a focus on maximising economic development opportunities along the railway corridor. This is set out in the Borders Railway 'Maximising the Impact: A Blueprint for the Future' (November 2014). The LDP takes cognisance of this.</li> <li>• Comments noted. There is currently a substantial mixed use site allocated within Reston as well as both short term and longer term housing sites. It is considered these are sufficient to address any need as a result of the Reston railway station being reinstated.</li> <li>• The Economic Development section of SBC has been heavily involved in the allocation of business and industrial land through the preparation of this Proposed Plan. The need for business and industrial land in Eddleston has not arisen through discussions with the Council's Economic Development Section. A redevelopment site in Walkerburn could potentially accommodate business/industrial development.</li> </ul>	<p>No action required.</p>
<p>Growing our</p>	<p>General</p>	<p>There are many towns and settlements within the</p>	<p>Comments noted. It is agreed that</p>	<p>No action required.</p>

economy: Question 3		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. <b>(166)</b>	there is a focus on maximising economic development opportunities along the railway corridor. This is set out in the Borders Railway 'Maximising the Impact: A Blueprint for the Future' (November 2014). There are a number of sites allocated within the Proposed Plan for redevelopment. The Council encourages the redevelopment of brownfield sites for a variety of uses including housing, employment or retailing which will support the opportunity of bringing such land back into productive use and to enhance the surrounding environment. Caberston Farm/Old Mill is allocated for redevelopment in Walkerburn (zR200).	
Growing our economy: Question 3	General	The contributors do not believe there are any settlements in which new or more business and industrial land should be allocated. <b>(179, 181, 192)</b>	Comments noted.	No action required.
Growing our economy: Question 3	General	The contributors consider that there are enough areas which industry and businesses could use without building new. <b>(189, 276)</b>	Comments noted. The Council would encourage the use of brownfield land and has identified a number of brownfield redevelopment sites across the Scottish Borders which are derelict and relevant infill and redevelopment policies can support such proposals.	No action required.
Growing our economy: Question 3	General - Hawick	There is a great need for new/more business and industrial land in Hawick. <b>(190, 290, 297)</b>	The Council is proposing the allocation of a large high amenity business site at Burnfoot in Hawick (BHAWI004) as well as a business	No action required.

			and industrial site at Gala Law II (BHAWI003). These are over and above existing allocations at Burnfoot (BHAWI001) and Gala Law (zEL60 and BHAWI002).	
Growing our 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 <sup>st</sup> century and allow forward thinking. <b>(197)</b>	Scottish Borders Council has campaigned for the reinstatement of the railway line between Tweedbank and Carlisle via Hawick. Most recently funding for a feasibility study to assess the implications of reinstating the railway line has been confirmed as part of the Heads of Terms of Agreement for the Borderlands Inclusive Growth Deal. The Council has unanimously supported a motion to reinstate the railway line on the original route and continues to support that outcome.	No action required.
Growing our economy: Question 3	General – Railway Corridor	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 outside the area, most likely in Edinburgh, so maximum use should be made of the new railway service between Edinburgh and Tweedbank. <b>(201, 229)</b>	Comments noted and agreed. It is agreed that there is a focus on maximising economic development opportunities along the railway corridor and the LDP addresses this. This is set out in the Borders Railway 'Maximising the Impact: A Blueprint for the Future' (November 2014).	No action required.
Growing our economy: Question 3	General	The contributor notes that the investment in the railway line should be utilised and where there is more infrastructure capacity. <b>(203)</b>	Comments noted and agreed. It is agreed that there is a focus on maximising economic development opportunities along the railway corridor and the LDP addresses this and identifies the need to upgrade infrastructure where necessary. This is set out in the Borders Railway 'Maximising the Impact: A	No action required.

			Blueprint for the Future' (November 2014).	
Growing our 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. <b>(206)</b>	Comments noted. Whilst the outcome and any consequent impacts of Brexit remain uncertain, it is likely there will be changes to the rural economy and land uses. This may include the need for more farm diversification proposals and likely significant pressures for forestry planting. Consequently, within the decision making process the LDP gives more weight to any economic development benefits for new business, leisure and tourism developments in the countryside.	No action required.
Growing our 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. <b>(212)</b>	Comments noted. There are a number of sites allocated within the Proposed Plan for redevelopment. The Council encourages the redevelopment of brownfield sites for a variety of uses including housing, employment or retailing which will support the opportunity of bringing such land back into productive use and to enhance the surrounding environment.	No action required.
Growing our 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. <b>(213)</b>	Comments noted.	SBC will continue to consult SNH on proposals when required.
Growing our 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	The Proposed Plan includes an allocation for business and industrial land in Greenlaw (BGREE005). This has been proposed in line with advice from the Council's Economic	No action required.

		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 these areas of land indicates that an alternative use may encourage more constructive growth in the village. <b>(215)</b>	Development section who consider there is demand for business/industrial land within the village.	
Growing our economy: Question 3	General - Selkirk	There are many brownfield sites within our towns such as Selkirk with excess industrial land that could be allocated. <b>(221, 289)</b>	Comments noted. There are a number of sites allocated within the Proposed Plan for redevelopment. The Council encourages the redevelopment of brownfield sites for a variety of uses including housing, employment or retailing which will support the opportunity of bringing such land back into productive use and to enhance the surrounding environment.	No action required.
Growing our 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. <b>(222)</b>	Comments noted. This would be dictated primarily by the local market. Finding such land in Peebles is a challenge for a range of reasons.	No action required.
Growing our economy: Question 3	General – Galashiels	The contributor suggests using the former yard (assuming Burgh Yard). <b>(229)</b>	Burgh Yard in Galashiels is allocated for redevelopment within the current LDP and this will be carried forward into the Proposed Plan (zCR2).	No action required.
Growing our economy: Question 3	General – Bonchester Bridge, Denholm, Jedburgh	The contributor suggests Bonchester Bridge, Denholm and Jedburgh. <b>(230)</b>	Comments noted. Input has been sought from the Council's Economic Development Section who do not consider there to be demand within Bonchester Bridge and Denholm. There are a number of sites	No action required.



			allocated for business/industrial use in Jedburgh.	
Growing our 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. <b>(206)</b>	Comments noted. The land in question has not been submitted through the Call for Sites process. It should also be noted that the land in question is subject to flood risk. The Council has, however, identified a site to the west of Innerleithen (MINNE003) which will incorporate an element of business/industrial land. There are other business sites already allocated in Innerleithen.	No action required.
Growing our 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. <b>(236, 283)</b>	Comments noted. One of the main challenges of the LDP has been to find new land for business and industrial use in the vicinity of Peebles. There are significant constraints in identifying such land within this area. Due to the ongoing uncertainty as to when or indeed if a new bridge will be built, any proposals identified to the southern side of the town can only be longer term options. A 4.9 ha site has been identified for business land at Eshiels. Furthermore, Policy ED7 – Business, Tourism and Leisure Development in the Countryside allows for appropriate employment generating development in the countryside subject to standard criteria text.	It is recommended that the Council agrees to allocate site (BESHI001) within the Proposed Local Development Plan.
Growing our economy: Question 3	General – Peebles	The contributor considers that the old factory on March Street, Peebles should be allocated for job creation. <b>(247)</b>	It should be noted that the site suggested by the contributor is already allocated within the current LDP through the Supplementary	No action required.

			Guidance on Housing adopted in November 2017. The site, MPEEB007 March Street Mills is an allocated mixed use site. It is intended that the site will provide a mix of uses including housing, employment and potentially commercial and community. It is therefore recommended that no change is proposed in relation to this site.	
Growing our 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. <b>(273, 285)</b>	Comments noted. Cavalry Park has now developed to capacity and there is a need for business/industrial land within the area to meet local demand. One of the main challenges of the LDP has been to find new land for business and industrial use in the vicinity of Peebles. Ensuring there is an appropriate level of business/industrial land is a vital necessity for any town in order to help meet demand, create jobs and help the economy. However, there are significant constraints in identifying such land within this area. Due to the ongoing uncertainty as to when or indeed if a new bridge will be built, any proposals identified to the southern side of the town can only be longer term options. A 4.9 ha site has been identified for business land at Eshiels.	No action required.
Growing our economy:	General – West Linton	The contributor considers that new business and industrial land should be identified given that the	Comments noted. It should be noted that the current Adopted Local	No further action required.

Question 3		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. <b>(214)</b>	<p>Development Plan allocates one Business and Industrial site – site zEL18. Scottish Planning Policy states that “<i>Local development plans should allocate a range of sites for business, taking account of the current market demand; location, size, quality and infrastructure requirements</i>”. The continued allocation of the site is supported by the Council’s Economic Development section.</p> <p>In light of the consultation responses received during the Main Issues Report public consultation and following further consideration on the matter, primarily due to the change in ownership and the existence of an already allocated employment site (zEL18) it is now not considered appropriate to allocate site BWEST003 within the Proposed Plan</p>	
Growing our 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. <b>(239, 241)</b>	It has proved difficult to identify land within the Peebles area for business/industrial use due to a range of constraints. A 4.9 ha site has been identified for business land at Eshiels.	No action required.
Growing our 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	Brownfield sites have been assessed if they have been submitted for consideration by the land owner or where the Council has become aware of their availability. The LDP continues to support the redevelopment of	No action required.

		<p>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. <b>(243)</b></p>	<p>brownfield sites. The Economic Development Section has been heavily engaged in the process of identifying land for business and industrial purposes where they are aware of established demand. The Council undertakes an Employment Land Audit annually in order to monitor the supply, take-up and status of business and industrial land in the Scottish Borders. Child care facilities within a business site can attract employees to an area who are in need for such a facility to enable them to be able to work.</p>	
<p>Growing our economy: Question 3</p>	<p>General – Selkirk</p>	<p>The contributor considers that the bypass is the key in Selkirk. <b>(258)</b></p>	<p>Comments noted. The road capacity within the centre of the town poses particular difficulties for traffic movement and parking. The line of the proposed Selkirk bypass is protected by Policy IS4 – Transport Development and Infrastructure. This would provide the opportunity to further improve the town centre environment, enhance road linkages within the Central Borders and speed up journey times from Hawick northwards. Whilst the bypass is safeguarded, there is currently no Scottish Government commitment and further studies would be required to identify the exact line and establish community and environmental impacts. If the bypass is built in the future, there are areas adjacent to it which could</p>	<p>No action required.</p>

			be identified for potential longer term development.	
Growing our 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. <b>(277)</b>	Comments noted. It is agreed that there is a focus on maximising economic development opportunities along the railway corridor. This is set out in the Borders Railway 'Maximising the Impact: A Blueprint for the Future' (November 2014). The sites allocated for business and industrial use are predominantly located within or adjacent to settlements across the Borders and consideration is given to current and improved pedestrian and public transport provision.	No action required.
Growing our economy: Question 3	General	The contributor considers there is plenty of unused space already in the Borders. <b>(281)</b>	Comments noted. The Council seeks to identify redevelopment sites, where appropriate.	No action required.
Growing our 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 Masterplans for both settlements, consideration could be made towards	Comments noted. It is difficult to provide further allocations within Galashiels and Stow due to a variety of constraints. One additional site has been identified in Galashiels for business and industrial purposes at Winston Road (BGALA006).	No action required.

		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. <b>(294)</b>		
Growing our 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 bypass 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"> <li>• 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)</li> <li>• former Baptist church site (the Valley)</li> <li>• former Burgh School site - Chapel Street</li> <li>• former fish farm site (Philiphaugh Mill) - suggest a detailed brief be prepared</li> <li>• residual buildings/ sites (former Mill premises) in the Riverside area. <b>(305)</b></li> </ul>	<p>Comments noted. The road capacity within the centre of the town poses particular difficulties for traffic movement and parking. The line of the proposed Selkirk bypass is protected by Policy IS4 – Transport Development and Infrastructure. This would provide the opportunity to further improve the town centre environment, enhance road linkages within the Central Borders and speed up journey times from Hawick northwards. Whilst the bypass is safeguarded, there is currently no Scottish Government commitment and further studies would be required to identify the exact line and establish community and environmental impacts. If the bypass is built in the future, there are areas adjacent to it which could be identified for potential longer term development.</p> <p>The plan identifies four sites for redevelopment in Selkirk, these include the former St Mary's Church site and the site at Chapel Street. The former fish farm site is proposed for residential development (ASELK040) and part of the Riverside area (Forest Mill) is</p>	No action required.

			identified for redevelopment. There are policies within the LDP which promote the redevelopment of brownfield sites.	
Growing our 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. <b>(315)</b>	Whilst the outcome and any consequent impacts of Brexit remain uncertain, it is be likely there will be changes to the rural economy and land uses. This may include the need for more farm diversification proposals and likely significant pressures for forestry planting. Consequently, within the decision making process Policy ED7 of the LDP gives more weight to any economic development benefits for new business, leisure and tourism developments in the countryside.	No action required.

## 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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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?

Main Issue	Sub Issue	Summary of Main Issues Raised	Proposed Response to Main Issues Raised	Recommendation
Growing our 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. <b>(27)</b>	Comments noted. It is considered that these locations do have satisfactory transport links and following liaison with the Council's Economic Development Section, it has been established that there are demands for business/industrial land within these locations.	No action required.
Growing our 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. <b>(174, 288, 289)</b>	Comments noted and agreed. Having considered consultation responses received to the Main Issues Report and following liaison with the Economic Development Section, the Council proposes a High Amenity/Business and Industrial site to the south of Pinnaclehill (BKELS006).	Comments noted and agreed. It is recommended that the Council agrees to allocate site BKELS006 as a high amenity business site and business and industrial site.
Growing our 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	Comments noted. Following further discussions with the Council's Economic Development section, it has been agreed that no further business and industrial land is required in Lauder within the period of this Plan. This will be reviewed during the process of the next Local Development Plan.	No action required.

		should be included for all allocations in this area to ensure that project level Habitats Regulations Appraisal is carried out if required. <b>(213)</b>		
Growing our economy: Question 4	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 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. <b>(213)</b>	Comments noted. Following the consultation period of the Main Issues Report, the Council has established a suitable site for the purposes of business/industrial use on land to the north west of Deanfield Place in Town Yetholm (BYETH001). Scottish Natural Heritage have been consulted through this process and have raised no objections to the proposed allocation.	It is recommended that the Council agrees to allocate site (BYETH001) as a high amenity business site and business and industrial site on land to the north west of Deanfield Place in Town Yetholm.
Growing our 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. <b>(203)</b>	Comments noted. The sites allocated have been informed by input from the Council's Economic Development team who deal with enquiries from businesses on a regular basis and therefore have a grasp of demand in the area. Some business units would be built to the requirements of the end user.	No action required.
Growing our 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. <b>(213)</b>	Comments noted. All allocations are subject to the Strategic Environmental Assessment (SEA). Furthermore, site requirements stipulate any issues which require to be considered through any planning application. Furthermore, planning briefs are required where it is considered justified and beneficial. The Council will be happy to consult SNH on any relevant planning briefs.	No action required.

<p>Growing our economy: Question 4</p>	<p>General</p>	<p>The contributor is of the view that it would make sense to allocate land for business use in areas already containing businesses. <b>(232)</b></p>	<p>Comments noted. Sites proposed for business and industrial use within the Proposed Plan are generally located within settlements where other businesses exist and where population and potential workforce are generally greater. However there remains a requirement to allocate some business use allocations in rural areas where a demand is identified.</p>	<p>No action required.</p>
<p>Growing our economy: Question 4</p>	<p>General</p>	<p>The contributor believes that it should be looked at more sensibly and sensitively and that it should include local people more effectively. <b>(297)</b></p>	<p>The Council undertakes wide public consultation through the process of the preparation of the Local Development Plan and it is considered that there are opportunities for local people to engage in the process as various stages. The Council's Economic Development Section receive requests from parties seeking business land and premises and this helps gauge where new site allocations should be sought.</p>	<p>No action required.</p>

## 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	Proposed Response to Main Issues Raised	Recommendation
Growing our 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? <b>(23)</b>	The Local Development Plan 2016 identifies this site for redevelopment. A Planning Brief for the site notes that it would be suitable for a mixture of uses including office, hotel, retail, leisure, residential and non-residential institution. The site contains contamination from historical land uses and this would require to be surveyed at the development stage.	No action required.
Growing our 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). <b>(24)</b>	Comment noted and agreed. The Proposed Plan proposes amendments to Policy ED1: Protection of Business and Industrial Land whereby a more flexible approach is adopted in order to allow a range of uses within allocated sites, where these uses compliment the business/industrial site.	It is recommended the Council agrees to amend Policy ED1: Protection of Business and Industrial Land whereby a more flexible approach is adopted.
Growing our economy: Question 5	General – Galashiels / Selkirk / Hawick	The contributor considers that the industrial areas of Galashiels, Selkirk and Hawick should be expanded. <b>(27)</b>	It is difficult to provide further allocations within Galashiels and Stow due to a variety of constraints. One additional site has been identified in Galashiels for business and industrial purposes at Winston Road (BGALA006). There is an extensive area of business and industrial land at Selkirk Riverside. The Council is proposing the	It is recommended that the Council agrees to allocate land at Winston Road, Galashiels (BGALA006) for business and industrial purposes. Furthermore, it is recommended that

			allocation of a large high amenity business site at Burnfoot in Hawick (BHAWI004) as well as a business and industrial site at Gala Law II (BHAWI003). These are over and above existing allocations at Burnfoot (BHAWI001) and Gala Law (zEL60 and BHAWI002).	the Council agrees to allocate land to South of Burnhead (BHAWI004) and Gala Law II (BHAWI003) for business and industrial purposes.
Growing our economy: Question 5	General	The contributor suggests reducing rates in high streets to encourage more businesses to take up units. <b>(147)</b>	Comment noted. This is outwith the remit of planning control.	No action required.
Growing our 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. <b>(151)</b>	The Council's Economic Development section is engaged in the process of identifying sites and considering policies. Economic Development are engaged with potential users of business/industrial sites on a regular basis. The Plans and Research team undertake a Business and Industrial Land Audit annually. This monitors the take-up of sites and supply and enables the team to establish areas of demand.	No action required.
Growing our 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. <b>(166)</b>	The Council's Economic Development section is engaged in the process of identifying sites and considering policies. The Council, including the Plans and Research Team, are happy to meet with any interested parties regarding the development of business land.	No action required.
Growing our economy: Question 5	General	The contributor suggests that units are prebuilt to make it easier for small businesses to move into <b>(168)</b>	Comments noted. This is often the case. However, care must be taken to ensure there is sufficient demand.	No action required.
Growing our economy:	Hawick	The contributor considers that old and historic buildings should be used for business in Hawick	There are a number of sites allocated within the Proposed Plan	No action required.

Question 5		and that there should be a greater focus on Hawick. <b>(190)</b>	for redevelopment in Hawick. The Council encourages the redevelopment of brownfield sites for a variety of uses including housing, employment or retailing which will support the opportunity of bringing such land back into productive use and to enhance the surrounding environment.	
Growing our economy: Question 5	Background / General	<p>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</p>	Comments and support noted. Developer contributions are requested where considered necessary and reasonable.	No action required.

		<p>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. <b>(195)</b></p>		
<p>Growing our economy: Question 5</p>	<p>General</p>	<p>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? <b>(197)</b></p>	<p>Comments noted. Whilst the outcome and any consequent impacts of Brexit remain uncertain, it is likely there will be changes to the rural economy and land uses. This may include the need for more farm diversification proposals and likely significant pressures for forestry planting. Consequently, within the decision making process Policy ED7 of the LDP gives more weight to any economic development benefits for new business, leisure and tourism developments in the countryside. Such proposals can be supported</p>	<p>No action required.</p>



			without them being formally allocated in the LDP.	
Growing our 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. <b>(206)</b>	Comments noted and agreed. Compulsory Purchase Orders are an option and have been used in some instances in the past.	No action required.
Growing our economy: Question 5	General - Hawick	The contributor considers that brownfield sites should be a priority for business and industrial development <b>(251)</b> . 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. <b>(212)</b>	There are a number of sites allocated within the Proposed Plan for redevelopment. The Council encourages the redevelopment of brownfield sites for a variety of uses including housing, employment or retailing which will support the opportunity of bringing such land back into productive use and to enhance the surrounding environment. The Proposed Plan takes forward a new high amenity business site on land to the south of Burnhead (BHAWI004). Hawick has received recent positive economic investment and these projects will contribute to the overall regeneration of the town. The majority of the business and industrial allocations in Hawick are located on the approach into the town from the north. There are means however in ensuring development is appropriately sited, designed and landscaped to ensure there is no detrimental impact upon the character of the area/historic sites.	No action required.
Growing our economy:	General	Scottish Natural Heritage (SNH) highlight that the delivery of sites is complex and many aspects are	Comments noted. SBC will continue to consult SNH on	No action required.

Question 5		<p>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. <b>(213)</b></p>	proposals when required.	
Growing our economy: Question 5	General	<p>The contributor believes the Council must monitor requests for existing land effectively to ensure these are not being protected for other uses. <b>(214)</b></p>	<p>The Plans and Research team undertake a Business and Industrial Land Audit annually. This monitors the take-up of sites and supply and enables the team to establish areas of demand. Consequently LDP Policy ED1 ensures appropriate uses within sites.</p>	No action required.
Growing our economy: Question 5	General	<p>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. <b>(216)</b></p>	<p>Comments noted. These are matters which are considered by and dealt with by the bodies referred to.</p>	No action required.
Growing our economy: Question 5	General	<p>The contributor states “don’t build houses everywhere”. <b>(222)</b></p>	<p>Scottish Planning Policy (SPP) requires Council’s to identify a generous supply of land for housing within all housing market areas, across a range of tenures maintaining a 5 year supply of</p>	No action required.

			effective housing at all times.	
Growing our economy: Question 5	General	The contributor notes with support from the Scottish Government. <b>(230)</b>	Comment noted.	No action required.
Growing our economy: Question 5	General	The contributor requires clarification on the use of the word 'delivered'. <b>(231)</b>	The question seeks thoughts on how business and industrial land can be provided/supplied/transferred more effectively including how funding can be sought.	No action required.
Growing our 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. <b>(236)</b>	Comments noted. These comments are also relevant to the Economic Development team and the relevant agencies.	No action required.
Growing our 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. <b>(239)</b>	Comments noted. Appendix 4 of the Proposed Plan details the publicity and consultation undertaken and Officers continue to be happy to discuss and consider suggested improvements to the consultation and engagement process.	No action required.
Growing our economy: Question 5	General	Industrial units should be on the edge of towns away from houses. <b>(241)</b>	Comment noted. The proximity of business and industrial land to residential properties is considered both during the process of the allocation of sites and planning applications.	No action required.
Growing our 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	Whilst the outcome and any consequent impacts of Brexit remain uncertain, it is likely there will be changes to the rural economy and land uses. This may include the	It is recommended the Council agrees to amend Policy ED7: Business, Tourism and

		recommendations of the National Council of Rural Advisors. ( <a href="https://www.gov.scot/publications/new-blueprint-scotlands-rural-economy-recommendations-scottish-ministers/">https://www.gov.scot/publications/new-blueprint-scotlands-rural-economy-recommendations-scottish-ministers/</a> ). 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. <b>(242)</b>	need for more farm diversification proposals and likely significant pressures for forestry planting. Consequently, within the decision making process Policy ED7 of the LDP gives more weight to any economic development benefits for new business, leisure and tourism developments in the countryside. Policy ED7 can support rural developments on unallocated sites.	Leisure Development in the Countryside whereby more weight is given to the consideration of the economic benefits of any relevant planning application.
Growing our 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). <b>(261)</b>	Comments noted. There is a focus on maximising economic development opportunities along the railway corridor. This is set out in the Borders Railway 'Maximising the Impact: A Blueprint for the Future' (November 2014). All potential development site options give consideration to accessibility.	No action required.
Growing our 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. <b>(277)</b>	The Council must make a judgement as to whether or not the loss of business/industrial land is acceptable at that location. The Council carries out an annual Employment Land Audit to monitor business land need and allocates land in the LDP accordingly. It would be unreasonable to expect a developer to provide business/industrial land elsewhere given likely ownership constraints.	No action required.
Growing our economy: Question 5	General	The contributor believes the Council should consult with potential users. <b>(280)</b>	The Council's Economic Development section is engaged in the process of identifying sites and considering policies. Economic Development are engaged with	No action required.

			potential users of business/industrial sites on a regular basis.	
Growing our economy: Question 5	General	The contributor recommends that the Use Class restriction is reduced. <b>(283)</b>	Comment noted. The Proposed Plan proposes amendments to Policy ED1: Protection of Business and Industrial Land whereby a more flexible approach is adopted in order to allow a range of uses within allocated sites, where these uses compliment the business/industrial site.	It is recommended the Council agrees to amend Policy ED1: Protection of Business and Industrial Land whereby a more flexible approach is adopted.
Growing our economy: Question 5	General	The contributor advises that the process should be as simple and straightforward as possible. <b>(288)</b>	Comments noted.	No action required.
Growing our economy: Question 5	General	The contributor believes that the Strategic Development Plan is the correct vehicle, over time. <b>(290)</b>	Comments noted.	No action required.
Growing our economy: Question 5	General	The contributor believes that allowing redundant industrial sites for housing should be stopped. <b>(292)</b>	Comments noted. Any proposals for housing on business and industrial would be assessed against Policy ED1: Protection of Business and Industrial Land which requires a number of criterion to be met.	No action required.
Growing our 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. <b>(295)</b>	Comments noted. Policy ED1: Protection of Business and Industrial Land seeks to ensure that adequate supplies of business and industrial land are retained for business and industrial use. There are a number of business and industrial sites allocated within the Plan which permit Use Classes 4, 5 and 6 (storage and distribution).	No action required.
Growing our economy:	General	Local knowledge and local business directories should be utilised more effectively alongside more	Comments noted. The Economic Development team of the Council	No action required.

Question 5		consultation with the populations. <b>(297)</b>	monitor interest from local businesses. Appendix 4 of the Proposed Plan details the publicity and consultation undertaken.	
Growing our 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. <b>(305)</b>	Comments noted. The line of the proposed Selkirk bypass is protected by Policy IS4 – Transport Development and Infrastructure. This would provide the opportunity to further improve the town centre environment, enhance road linkages within the Central Borders and speed up journey times from Hawick northwards. Whilst the bypass is safeguarded, there is currently no Scottish Government commitment and further studies would be required to identify the exact line and establish community and environmental impacts. If the bypass is built in the future, there are areas adjacent to it which could be identified for potential longer term development. This is highlighted within the settlement profile for Selkirk within Volume 2 of the Proposed Plan.	No action required.
Growing our 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. <b>(315)</b>	Comments noted and agreed.	No action required.
Growing our 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	Comments noted and agreed.	No action required.

		that is currently occupied and available for employment use. <b>(318)</b>		
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## 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?



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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	Proposed Response to Main Issues Raised	Recommendation
Duns	MDUNS005, South of Earlsmeadow, Phase 1	<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</p>	<p>Comments noted.</p> <p>The site was included within the MIR as an alternative option for mixed use development. However, the site has ultimately not been included within the Proposed LDP.</p> <p>It is noted that SEPA have requested that a feasibility study including a FRA is undertaken prior to development to assess the potential for channel restoration and the risk from the small watercourse. Although (MDUNS005) will not be taken forward, it forms part of the longer term site (SDUNS001) within the current LDP. (SDUNS001) will be retained for longer term mixed use development. It is therefore recommended that the site requirement for (SDUNS001) is updated to reflect the most up to date advice from SEPA, in respect of the potential for channel restoration and risk from the small watercourse.</p> <p>The comments in respect of foul drainage are noted. It is noted that</p>	<p>It is recommended that the Council agree not to allocate the site MDUNS005 within the Proposed LDP.</p> <p>It is recommended that the Council agree to update the existing site requirement attached to SDUNS001, to read; <i>'A feasibility study, including a Flood Risk Assessment will be required to assess the potential for channel restoration and the risk from the small watercourse, including mitigation where necessary'</i> and include reference to foul water disposal and SEPA permissions</p>

		<p>water hazard.</p> <p>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. <b>(119)</b></p>	<p>SEPA state foul water must connect to the existing Scottish Water foul network. Therefore, it is recommended that reference is made to foul water disposal within the introductory text to Volume 2 of the Proposed LDP. It is considered that the above satisfactorily addresses the comments raised by SEPA.</p> <p>Comments are noted in respect of any permissions which may be sought from SEPA.</p>	<p>within the introductory text to Volume 2 of the Proposed LDP.</p>
Duns	MDUNS005, South of Earlsmeadow, Phase 1	<p>The contributor states that the site is far too big a suggested development. <b>(197)</b></p>	<p>Comments noted. The site in question is a longer term site and would be developed in phases.</p>	<p>It is recommended that the Council agree not to allocate the site MDUNS005 within the Proposed LDP.</p>
Greenlaw	BGREE005, Land South of Edinburgh Road	<p>SEPA advise that there is a potential surface water hazard on this site.</p> <p>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.</p> <p>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</p>	<p>Comments noted.</p> <p>The site is currently allocated for mixed use development within the adopted LDP (MGREE001). The site (BGREE005) was included within the MIR as a preferred option for business &amp; industrial development and has been included within the Proposed LDP.</p> <p>SEPA and Scottish Water were previously consulted at the 'Pre MIR' stage and their advice has been taken on board and</p>	<p>It is recommended that the Council agree to allocate the site BGREE005 within the Proposed LDP and include reference to foul water disposal and SEPA permissions within the introductory text to Volume 2 of the Proposed LDP.</p>

		sought for certain activities from SEPA. <b>(119)</b>	<p>incorporated within the following site requirements;</p> <ul style="list-style-type: none"> <li>- <i>'Consideration must be given to surface water runoff and any flood risk'</i>; and</li> <li>- <i>'Early engagement with Scottish Water to ascertain whether a Drainage Impact Assessment and Water Impact Assessment are required, in respect of WWTW and WTW'</i>.</li> </ul> <p>The comments in respect of foul drainage are noted. It is noted that SEPA state foul water must connect to the existing Scottish Water foul network. Therefore, it is recommended that reference is made to foul water disposal within the introductory text to Volume 2 of the Proposed LDP. It is considered that the above satisfactorily addresses the comments raised by SEPA.</p> <p>Comments are noted in respect of any permissions which may be sought from SEPA.</p>	
Greenlaw	BGREE005, Land South of Edinburgh Road	The contributor states that they are suspicious where no indication of site capacity given. <b>(197)</b>	<p>Comments noted. The site (BGREE005) was included within the MIR as a preferred option for business &amp; industrial development. There is no site capacity, given that there is no housing element proposed.</p>	No action required.

<p>Westruther</p>	<p>BWESR001, Land South West of Mansefield House</p>	<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. <b>(119)</b></p>	<p>Comments noted. The site was included within the MIR as a preferred option for business &amp; industrial development and is included within the Proposed LDP.</p> <p>SEPA were previously consulted at the 'Pre MIR' stage and their advice was taken on board and incorporated within the site requirements. Within the MIR, the following site requirement was attached in respect of flood risk; <i>'Flood Risk Assessment required to assess the risk from the small watercourse which is adjacent to the site'</i>.</p> <p>It is noted that SEPA have requested that a feasibility study including a FRA is undertaken, prior to development to assess the potential for channel restoration. It is therefore recommended that the existing site requirement is updated to reflect their advice.</p> <p>In respect of foul water comments, SEPA and Scottish Water were previously consulted at the 'Pre MIR' stage and their advice was taken on board and incorporated within the site requirements. Within the MIR, the following site requirement was attached in respect of the WWTW and WTW, <i>'Early engagement with Scottish Water, in</i></p>	<p>It is recommended that the Council agree to include the site BWESR001 within the Proposed LDP and include reference to foul water disposal and SEPA permissions within the introductory text to Volume 2 of the Proposed LDP.</p> <p>It is recommended that the Council agree to update the proposed site requirement to read as follows; <i>'A feasibility study, including a Flood Risk Assessment will be required to assess the potential for channel restoration and the risk from the small watercourse which is adjacent to the site'</i>.</p>
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			<p><i>respect of the WWTW and WTW'. It is noted that SEPA state foul water must connect to the existing Scottish Water foul network. Therefore, it is recommended that reference is made to foul water disposal within the introductory text to Volume 2 of the Proposed LDP. It is considered that the above satisfactorily addresses the comments raised by SEPA.</i></p> <p>Comments are noted in respect of any permissions which may be sought from SEPA.</p>	
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## 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	Proposed Response to Main Issues Raised	Recommendation
Growing our economy: Question 6	MINNE003 Land West of Innerleithen	<p>The contributor objects to the inclusion of MINNE003 as a preferred mixed use site. <b>(17, 67, 119, 162, 183, 206, 213, 225, 275)</b></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. <b>(67)</b></p> <p>The contributor feels that development of the site will have a detrimental impact on existing neighbouring residential streets. <b>(275)</b></p> <p>The contributor highlights the Health &amp; 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. <b>(67)</b></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. <b>(17)</b></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. <b>(67, 225, 275)</b></p>	<p>This response relates to all representation objections to site MINNE003.</p> <p>The Local Development Plan process is a constant process in that the Council is required to ensure a continual 5 year housing land supply and an up to date plan. Sites previously assessed as part of previous plans can come forward again as part of this process. Whilst development at this location has been discounted in the past, there was potential for the Health Centre to expand, which would have been supported by the Council. The inclusion of this site allows for the expansion of the health centre to take place.</p> <p>It should be noted that the Council are required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas.</p> <p>Scottish Planning Policy requires Local Development Plans to allocate a range of sites which are effective or expected to become effective in</p>	<p>It is recommended that the Council agree to allocate this site within the Proposed Local Development Plan.</p> <p>It is further recommended that the following site requirements are also added to the Plan in relation to site MINNE003:</p> <ul style="list-style-type: none"> <li>• A Planning Brief in the form of Supplementary Planning Guidance to be produced for this site</li> <li>• A new vehicular access off the A72 Peebles Road will be required with connection to Angle Park</li> <li>• Pedestrian and</li> </ul>

		<p>The contributor states that the existing narrow access cannot be made wider. <b>(17)</b></p> <p>The contributor is concerned about the impact the allocation would have on the Health Centre. <b>(17)</b></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. <b>(67, 225, 275)</b></p> <p>The contributor states that development of this site would have a detrimental impact on the views from the Health Centre. <b>(67, 183)</b></p> <p>The contributor raises concerns about the impact development of the site may have on St Ronan's Primary School. <b>(17, 225, 275)</b></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. <b>(67)</b></p> <p>The contributor strongly opposes the designation of mixed use without there being a change to the powers 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</p>	<p>the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system. In the consideration of any site for inclusion in the Local Development Plan, a full site assessment is carried out and the views various internal and external consultees (such as Roads Planning, Education, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this a rigorous site assessment process is used to identify the best sites possible.</p> <p>Part of this site has been previously considered during the Local Plan Amendment process for housing – AINNE001. However it was not allocated due the fact that Innerleithen at that time had a number of housing sites allocated within the Plan which had not seen development commence, and other more suitable sites were identified in the Plan.</p> <p>In response to concern over time lapse of existing allocations not being developed, this site has been</p>	<p>cycle connectivity with Tweed View, Health Centre and the Multi Use Path will be required</p> <ul style="list-style-type: none"> <li>• This is a mixed use site which will incorporate a mixture of uses including housing and employment. This will be established in more detail with a Planning Brief. A minimum of 1ha of high amenity business land to be provided in line with Policy ED1: Protection of Business and Industrial Land which may include Class 6 (Storage or distribution) uses</li> </ul>
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	<p>facing outlook and doubts it is appropriate for business. However there is a need for business sites in Innerleithen. <b>(206)</b></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. <b>(67)</b></p> <p>The contributor states there is no identified need for new housing in Innerleithen. <b>(183, 225)</b></p> <p>The contributor suggests there are many gap sites in the area that should be filled before major development is undertaken. <b>(275)</b></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. <b>(17)</b></p> <p>The contributor fears the proposal will result in the loss of valued greenspace used by community for events throughout the year. <b>(17, 67, 162)</b></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. <b>(67)</b></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</p>	<p>allocated as mixed use with the opportunity for much needed business land to come forward.</p> <p>Any issues raised relating to loss of privacy and protection of residential amenity and noise will be dealt with at planning application stage, with reference to policy HD3.</p> <p>In relation to comments regarding roads and access the Roads Planning section have been consulted and have stated that they can support this site:  <i>"I have no objections to the allocation of this site for mixed use. There is ample opportunity for the easterly portion of the site to be well integrated with and connected to the surrounding street network i.e. Tweed View, St Ronan's Health Centre and Angle Park. The close proximity of the multi-use path to the south of the site offers a great opportunity to provide a pedestrian/cycle link to the site. I would not necessarily rule out direct access from the A72 into the site, however this would need to be carefully designed to ensure the appropriate gradients and visibility splays can be achieved. A strong street frontage would help have a positive impact on driver behaviour along this section of the A72. A Transport Assessment, or at least a</i></p>	
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		<p>use. We need to encourage less travel for commutes not encourage more. <b>(67)</b></p> <p>The contributor raises concerns as to whether the sewage system has capacity to cope with increased population. <b>(225)</b></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. <b>(67)</b></p> <p>The contributor notes the proposed site has been subject to flooding in previous years. <b>(67, 225)</b></p> <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. <b>(119)</b></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. <b>(67)</b></p> <p>The contributor highlights that site encompasses an historic Roman site which is of great significance to the area. <b>(162, 183)</b></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</p>	<p><i>Transport Statement, will be a prerequisite for development on this site to address matters of accessibility and sustainable transport."</i></p> <p>The Council have consulted with the NHS throughout the Local Development Plan process and will continue to do so. This then allows for them to plan according to their needs and demands. NHS Borders have stated that they will continue to engage with SBC colleagues to provide primary care and public health input to the wider planning process including the creation of the next Scottish Borders Council Local Development Plan early in its preparation cycle as part of a Health in All Policies approach.</p> <p>It should be noted that additional discussion has been carried out with the Education Officer who has stated that there is sufficient school capacity available to accommodate the new proposals contained within Proposed Local Development Plan.</p> <p>Comments relating to developers preferring to develop the site for housing, it should be noted that the MIR set out a number of site requirements that would be required to be met should that site come forward for development, these</p>	
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		<p>lost forever should this site be developed when approaching Innerleithen from the west. <b>(183)</b></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. <b>(213)</b></p>	<p>included a requirement for a Masterplan.</p> <p>It should be noted that the site is currently in agricultural use for grazing. It is not considered that the site will impact negatively on the green network around Innerleithen. The site can offer the potential for greater access to the adjacent multi-use path. There are two formally allocated greenspaces within Innerleithen, of which this site is not one of those safeguarded.</p> <p>In respect to comments regarding the use of the site for community events, it should be noted that the landowner is supportive of seeing development take place on the site. In addition, it is considered feasible that there may be the potential for such community events to take place elsewhere within the settlement.</p> <p>The Council has a statutory duty to identify sites within the Local Development Plan to satisfy housing need and demand. As noted above, all proposed sites are subject to extensive consultation from a range of bodies and consideration must always be given to a range of policies including environmental and roads planning matters. The Local Development Plan does strike the</p>	
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			<p>challenging balance between satisfying housing land requirements, identifying sites and giving consideration and protection to the environment. In addition to Planning, it should be noted that all built development is required to meet the Building Standards Regulations, the purpose of which is to ensure buildings are safe, efficient and sustainable.</p> <p>Whilst access to sewage facilities may currently be an issue, upgrades can overcome that issue.</p> <p>SEPA have been consulted and have not objected to the allocation of the site however a Flood Risk Assessment would be required to assist in the design and layout of the proposed development.</p> <p>It is noted that an archaeology evaluation and associated mitigation would be required should the site be developed. Comments concerning archaeological presence on the extreme south east corner of this site have been noted and the Archaeology Officer who has no objections stated: <i>“The south-east corner of the area contains the known site of a formerly Scheduled Roman camp. This should be avoided for preservation in situ. The remainder of the site may contain</i></p>	
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			<p><i>evidence for a Roman road. There is more generally archaeological potential given its topographic location. Evaluation will be required”.</i></p> <p>It is not considered that the entire site will be developed. The site requirements set out that landscape/structure planting will be required to assist in mitigating any visual impact of the site.</p> <p>It is noted that careful consideration will be required to achieve a scheme of structure planting that mitigates the visual impact of the development and assists in retaining existing views. This is an issue which would be dealt with at the planning application stage. It is noted that the Landscape Officer was consulted on this site, and had no objections, stated: <i>“The site is a large field to the south of A72 approaching Innerleithen from the west. The ground slopes steeply down from the A72 before levelling out in the south eastern part that borders the existing settlement boundary west of Buchan Place off Traquair Road. Careful consideration will be required to achieve a scheme of structure planting that mitigates the visual impact of the development when seen from the elevated A72 coming</i></p>	
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			<p><i>into Innerleithen from the west, while maintaining views southward across the Tweed valley”.</i></p> <p>In light of the consultation responses received during the Main Issues Report public consultation and following further consideration the matter, it is recommended that site MINNE003 Land West of Innerleithen is allocated for housing within the Proposed Local Development Plan.</p>	
<p>Growing our economy: Question 6</p>	<p>MINNE003 Land West of Innerleithen</p>	<p>The contributor supports the allocation of MINNE003 as a preferred mixed use option. <b>(91, 118 (2 of 2), 133, 283)</b></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. <b>(91)</b></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</p>	<p>Support and comments noted.</p> <p>In light of the consultation responses received during the Main Issues Report public consultation and following further consideration the matter, it is recommended that site MINNE003 Land West of Innerleithen is allocated for housing within the Proposed Local Development Plan.</p>	<p>It is recommended that the Council agree to allocate this site within the Proposed Local Development Plan.</p> <p>It is further recommended that the following site requirements are also added to the Plan in relation to site MINNE003:</p> <ul style="list-style-type: none"> <li>• A Planning Brief in the form of Supplementary Planning Guidance to be produced for this site</li> <li>• A new vehicular access off the</li> </ul>

		<p>Walkerburn waste water treatment works are understood to have sufficient capacity as have the water treatment works. 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. 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. <b>(118 (2 of 2))</b></p>		<p>A72 Peebles Road will be required with connection to Angle Park</p> <ul style="list-style-type: none"> <li>• Pedestrian and cycle connectivity with Tweed View, Health Centre and the Multi Use Path will be required</li> <li>• This is a mixed use site which will incorporate a mixture of uses including housing and employment. This will be established in more detail with a Planning Brief. A minimum of 1ha of high amenity business land to be provided in line with Policy ED1: Protection of Business and Industrial Land which may include Class 6 (Storage or distribution)</li> </ul>
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Growing our 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. <b>(67)</b>	The Council is not aware that the respondent has discussed these sites with the landowners. The Council has asked the respondent to submit more detailed plans showing the site boundaries in order that these sites can be properly consulted upon. However this information has not been forthcoming and consequently these sites cannot be considered for inclusion within the Proposed Plan at this point in time.	No further action.

## 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	Proposed Response to Main Issues Raised	Recommendation
Growing our 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. <b>(23)</b>	Comments noted. The marketing of any site is not a material planning consideration. It is assumed that these comments relate to Huddersfield Street/Hill Street (also known as Burgh Yard) site in Galashiels which is allocated for redevelopment and is currently being marketed by the Council (zCR2). A Planning Brief has been produced for the site to guide developers as it is located on one of the key approaches into Galashiels and its strategic prominence necessitates a high quality design incorporating sustainable development principles that achieve an appropriate form of buildings and spaces as well as an appropriate quality of design commensurate with its strategic town centre location.	No action required.
Growing our economy: Question 6	Agree	The contributor agrees although it is unclear which option he agrees with. <b>(25)</b>	Comments noted.	No action required.
Growing our 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. <b>(27)</b>	Comments noted.	No action required.
Growing our economy:	General	The contributor considers that mixed land use may be best. <b>(151)</b>	Comments noted. The Council does in some instances allocate	No action required.



Question 6			sites for mixed use development where considered appropriate.	
Growing our 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. <b>(152)</b>	Comments noted. Proposals for business development within rural areas are assessed against Policy ED7: Business, Tourism and Leisure Development in the Countryside which respect the amenity and character of the surrounding area and complies with the requirements of Policy PMD2: Quality Standards which requires that all development is expected to be of high quality in accordance with sustainability principles, designed to fit with Scottish Borders townscapes and to integrate with its landscape surroundings.	No action required.
Growing our economy: Question 6	General	The contributor believes business and housing should be separate. <b>(168)</b>	Comments noted. In some instances, a mixed use development is appropriate to an area depending upon the type of uses that already exist. In cases where businesses and residential properties within close proximity to each other, care is required to ensure a conflict of uses does not arise.	No action required.
Growing our 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. <b>(171, 263, 274, 312)</b>	Support for preferred options noted.	No action required.
Growing our 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	Comments noted. Any potential impact upon ancient woodland and ancient and veteran trees would be considered during the process of a formal planning application in	No action required.

		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. <b>(199)</b>	consultation with the Council's Landscape Architect. The Council notes the statements contained within this response. It is considered, however, that the wording of the existing policy is robust and appropriate and does not therefore consider that the proposed wording change is necessary.	
Growing our economy: Question 6	General	The contributor doesn't disagree massively and states that the job situation is dire in the Borders. <b>(203)</b>	Comments noted. As at August 2019, the unemployment rate in the Scottish Borders, as measured by the Claimant Count, remained at 2.6 %.	No action required.
Growing our 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. <b>(206)</b>	Comments noted. The Council is aware of the need for business land within the Tweeddale area moving forward and will be stringent in its requirements for an element of business land within any mixed use development, as appropriate.	No action required.
Growing our 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	Comments noted. The Council has stipulated this need within the site requirements for a number of the proposed mixed use sites as the site	No action required.

		<p>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. <b>(209)</b></p>	<p>is considered to offer the opportunity to meet an established need for business land in that particular area and a mixture of uses, incorporating a business element, is considered to be appropriate.</p> <p>This stipulation is the result of detailed consultation with the Council's Economic Development Section who monitor the demand for business land within the Scottish Borders and have an understanding of where business land is required.</p> <p>Mixed use developments offer a number of benefits. They can help to produce more vibrant, adaptable and pleasant environments and achieve sustainable places that minimise travel and support local demand for goods/services in a walkable catchment.</p>	
<p>Growing our economy: Question 6</p>	<p>General</p>	<p>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</p>	<p>Comments noted. Due to resource implications it is not unfortunately possible for the Council to prepare a Development Brief for all sites allocated within the Local Development Plan. It is considered the site requirements identify the main issues/constraints to be addressed. These are not exhaustive and other matters would be addressed at the planning application stage.</p>	<p>No action required.</p>

		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. <b>(213)</b>		
Growing our economy: Question 6	General	The contributor considers that mixed use land will prevent over-industrialisation. <b>(222)</b>	Comments noted. Mixed use developments offer a number of benefits. They can help to produce more vibrant, adaptable and pleasant environments and achieve sustainable places that minimise travel and support local demand for goods/services in a walkable catchment.	No action required.
Growing our economy: Question 6	General	The contributor requires clarification on what 'additional business and industrial land/mixed use land' means? <b>(231)</b>	'Additional business and industrial land/mixed use land' means land allocations over and above those allocated within the existing Local Development Plan 2016.	No action required.
Growing our 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. <b>(243)</b>	Comments noted. The importance of the quality of the environment is acknowledged by the Council. Any Planning Briefs for individual sites involve public engagement.	No action required.
Growing our economy: Question 6	General	The present plan would suburbanise the area. <b>(247)</b>	There is a statutory requirement for the Council to allocate land for development within the Local Development Plan. The sites brought forward as options have been assessed in detail to ensure they would not have a detrimental	No action required.

			impact upon the character of the area.	
Growing our 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. <b>(252)</b>	Comments noted. Elaboration of these views would have been useful. The sites being taken forward for mixed use development are considered to be appropriate in terms of the local context and need.	No action required.
Growing our economy: Question 6	General	The contributor is of the view that mixed use development is sensible. <b>(258)</b>	Comments noted. Mixed use developments offer a number of benefits. They can help to produce more vibrant, adaptable and pleasant environments and achieve sustainable places that minimise travel and support local demand for goods/services in a walkable catchment.	No action required.
Growing our 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. <b>(283)</b>	Comments noted.	No action required.
Growing our 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. <b>(289)</b>	The development of brownfield land and the extension of existing industrial land is encouraged as much as possible in line with national guidance. However, due to various constraints, this is not always possible. The Council identifies a number of redevelopment sites in town centres with a view to encouraging their reuse, for a variety of uses including commercial, residential and industrial. Regeneration is a reoccurring key theme through Scottish Planning Policy.	No action required.
Growing our	BHAWI003	SEPA advise that the site has a potential surface	Comments noted. The site	The site

economy: Question 6	(Gala Law II) Hawick	water hazard and water environment considerations. <b>(119)</b>	requirement should be amended in view of these comments.	requirement for the site which states 'Consideration is required to be given to surface water' should be replaced with 'Consideration is required to be given to surface water and water environment considerations'.
Growing our 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. <b>(199)</b> .	Comments noted, any requisite surveys would be identified and undertaken at the planning application stage.	No action required.
Growing our 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. <b>(119)</b>	Comments noted. The site requirement should be amended in view of these comments to read: 'Surface water flooding issues and water environment considerations will require to be addressed'.	The site requirement for the site which states 'Surface water flooding issues would require to be addressed' should be replaced with 'Surface water flooding issues and water environment considerations will require to be addressed'.
Growing our economy: Question 6	BHAWI004 (Land to south of Burnhead)	The proposed site BHAW1004, is not a 'brownfield' site and its development would interfere with the B listed 'tower' of Burnhead.	Historic Environment Scotland has raised no comments in respect of any potential impact upon	It is recommended that the Council agree to allocate

	Hawick	<p>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,</p>	<p>Burnhead. The Council's Heritage and Design Officer has noted that the site lies close to Burnhead Tower which is a category B listed tower house and advises that whilst the proposed development may have an impact on its setting, particularly if larger buildings are proposed, this can be addressed through mitigation.</p> <p>It is considered that appropriate structure planting along and within the north eastern boundary of the site would provide protection to the setting of Burnhead Tower. This is stipulated as a site requirement and would be further detailed through the process of a planning brief for the site.</p> <p>The site assessment concludes the following:</p> <p><i>'The Council's Economic Development Section has highlighted a need for sufficient employment land in Hawick. This is particularly pertinent at this time as funding is available in the forthcoming years from the South of Scotland Economic Partnership as a forerunner to a regional enterprise agency being launched in 2020. Economic Development identified this site as a possibility. Whilst there are concerns relating to the</i></p>	this site within the Proposed Local Development Plan.
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		<p>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 development. <b>(212)</b></p>	<p><i>location of the site within the Teviot Valleys SLA, the site is only just within the boundary and it is not considered that the development of the site, with mitigation and high quality design, would have a detrimental impact upon the SLA. The following issues would require to be addressed during the process of any planning application:</i></p> <ul style="list-style-type: none"> <li>• <i>A Planning Brief has been suggested by SNH.</i></li> <li>• <i>Issues relating to surface water would require to be addressed.</i></li> <li>• <i>Ecological impacts require to be considered with appropriate mitigation where appropriate.</i></li> <li>• <i>Burnhead Tower, a category B listed building to the north of the site, must be safeguarded. Mitigation to safeguard the setting is required.</i></li> <li>• <i>A Transport Statement is required.</i></li> <li>• <i>Improved connectivity is required.</i></li> <li>• <i>A Drainage Impact Assessment may be required.</i></li> <li>• <i>Structure planting required along the boundaries of the site, particularly along and within the north eastern boundary.</i></li> </ul> <p>Although the quality of this land may be good for agricultural purposes, the site is not prime quality agricultural land. A Planning Brief</p>	
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			would be undertaken for the site which would consider the design and siting of buildings in order to minimise visual impact.	
Growing our economy: Question 6	BHAWI004 (Land to south of Burnhead) Hawick	<p>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:</p> <ul style="list-style-type: none"> <li>• Green infrastructure connections through the site, including links to housing at Burnfoot and the existing path network to the east of Burnhead Road.</li> <li>• Suitable densities of development on less sensitive parts of the site, avoiding the most elevated part to the east of Boorvaw Road.</li> <li>• Close attention should be paid to the existing settlement edge and to maintaining key views from the A707 and the B6359. <b>(213)</b></li> </ul>	<p>Refer to response above.</p> <p>It is proposed that a planning brief will be produced relating to BHAWI001, BHAWI002 and BHAWI004. A separate planning brief would be prepared for AHAWI027 although it couldn't be ruled out this this would be produced alongside the aforesaid business and industrial sites. The planning briefs would consider in more detail layout, design, densities, landscape mitigation etc.</p> <p>The comments relating to green infrastructure connections are noted and agreed. It is recommended that a site requirement is added in this respect. The comments related to densities and views would be explored in closer detail through the process of the aforesaid planning briefs.</p>	<p>It is recommended that the Council agree to allocate this site within the Proposed Local Development Plan.</p> <p>It is recommended that a further site requirement is added, as follows: <i>'Green infrastructure connections through the site, including links to housing at Burnfoot and the existing path network to the east of Burnhead Road'</i>.</p>
Growing our economy: Question 6	MSELK002 (Heather Mill), MSELK003	Request that MSELK002, MSELK003 and MSELK004 are allocated as mixed use development opportunities with a specific	MSELK002 is allocated within the Local Development Plan 2016 as a mixed use site and it is intended that	It is recommended that the Council agrees to continue

	<p>(Land west of Heather Mill), MSELK004 (Land and buildings at Whinfield Mill) Selkirk</p>	<p>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. <b>(56)</b></p>	<p>this allocation will continue into LDP2. In respect of MSELK003 the allocation of this site for mixed use purposes is not regarded as acceptable for the reasons concluded during the site assessment process as follows:</p> <p><i>'Although the site is currently allocated within the Local Development Plan 2016 as a business and industrial site, this is a local designation which gives a low level of protection for this particular use. It is accepted that this site may be acceptable for residential use in the future, there is currently however the potential for a conflict of uses due to the fact that the land to the immediate south can still be utilised for business/industrial purposes. This potential conflict has also been identified by the Roads Planning Team. SEPA has also raised concerns relating to residential development behind a flood scheme.'</i></p> <p>The site was re-submitted at the 'MIR Consultation' stage for further consideration. The agent submitted further information to support the allocation of this site for mixed use development and believes that any concerns regarding the compatibility of uses could be addressed through the preparation of a planning brief or</p>	<p>allocation MSELK002 into LDP2 and agree not to allocate sites MSELK003 and MSELK004 for mixed use purposes.</p>
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			<p>technical reports (noise, air quality etc) at the planning application stage. Furthermore, the agent notes that the issues raised by SEPA can be addressed through further discussion with the Council in relation to the outcome of the Selkirk Flood Protection Scheme and the results of the final 'as built' model in order to determine the suitability of the sites in the Riverside area for further residential development. However, it is not considered that the information provided changes the earlier conclusion for the assessment of this site.</p> <p>In respect of MSELK004 the allocation of this site for mixed use purposes is not regarded as acceptable for the reasons concluded during the site assessment process as follows:</p> <p><i>'The site is designated as a district business and industrial site within the Local Development Plan 2016. Due to the existing character and nature of uses within the immediate vicinity of the site, it is not considered that a mixed use development would be acceptable at this location. The development of the site for mixed use purposes would lead to the loss of business/industrial land and raise a</i></p>	
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			<p><i>potential conflict in uses at this location. SEPA has also raised concerns relating to residential development behind a flood scheme.'</i></p> <p>The site was re-submitted at the 'MIR Consultation' stage for further consideration. The agent submitted further information to support the allocation of this site for mixed use development detailing that the site is not in any active business or industrial use and the prospect of securing such a use is very limited. The Agent argues that the site is located on the edge of the wider business area and is located adjacent to existing residential properties and that it also benefits from separate access points and has an outlook across the Ettrick Water. The agent believes that any concerns regarding the compatibility of uses could be addressed through the preparation of a planning brief or technical reports (noise, air quality etc) at the planning application stage. However, it is not considered that the information provided changes the earlier conclusion for the assessment of this site.</p>	
Growing our economy: Question 6	MSELK002 (Heather Mill) Selkirk	Welcome the retention and continued allocation of MSELK002 as a mixed use site within LDP2. <b>(56)</b>	Support noted.	No action required.
Growing our economy:	MSELK003 (Land west of	The site is currently allocated within the LDP 2016 for business and industrial use as part of	The allocation of this site for mixed use purposes is not regarded as	It is recommended that the Council

Question 6	Heather Mill) Selkirk	<p>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. <b>(56)</b></p>	<p>acceptable for the reasons concluded during the site assessment process as follows:</p> <p><i>‘Although the site is currently allocated within the Local Development Plan 2016 as a business and industrial site, this is a local designation which gives a low level of protection for this particular use. It is accepted that this site may be acceptable for residential use in the future, there is currently however the potential for a conflict of uses due to the fact that the land to the immediate south can still be utilised for business/industrial purposes. This potential conflict has also been identified by the Roads Planning Team. SEPA has also raised concerns relating to residential development behind a flood scheme.’</i></p> <p>The site was re-submitted at the 'MIR Consultation' stage for further consideration. The agent submitted further information to support the allocation of this site for mixed use development and believes that any concerns regarding the compatibility of uses could be addressed through the preparation of a planning brief or technical reports (noise, air quality etc) at the planning application stage. Furthermore, the agent notes that the issues raised by</p>	<p>agrees not to allocate this site for mixed use purposes and that it remains a business and industrial site as per LDP 2016.</p>
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			SEPA can be addressed through further discussion with the Council in relation to the outcome of the Selkirk Flood Protection Scheme and the results of the final 'as built' model in order to determine the suitability of the sites in the Riverside area for further residential development. However, it is not considered that the information provided changes the earlier conclusion for the assessment of this site.	
Growing our 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 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. <b>(56)</b>	The allocation of this site for mixed use purposes is not regarded as acceptable for the reasons concluded during the site assessment process as follows:  <i>'The site is designated as a district business and industrial site within the Local Development Plan 2016. Due to the existing character and nature of uses within the immediate vicinity of the site, it is not considered that a mixed use development would be acceptable at this location. The development of the site for mixed use purposes would lead to the loss of business/industrial land and raise a potential conflict in uses at this location. SEPA has also raised concerns relating to residential development behind a flood scheme.'</i>	It is recommended that the Council agrees not to allocate this site for mixed use purposes and that it remains a business and industrial site as per LDP 2016.

			<p>The site was re-submitted at the 'MIR Consultation' stage for further consideration. The agent submitted further information to support the allocation of this site for mixed use development detailing that the site is not in any active business or industrial use and the prospect of securing such a use is very limited. The Agent argues that the site is located on the edge of the wider business area and is located adjacent to existing residential properties and that it also benefits from separate access points and has an outlook across the Etrick Water. The agent believes that any concerns regarding the compatibility of uses could be addressed through the preparation of a planning brief or technical reports (noise, air quality etc) at the planning application stage. However, it is not considered that the information provided changes the earlier conclusion for the assessment of this site.</p>	
<p>Growing our economy: Question 6</p>	<p>Disagree with preferred and alternative options</p>	<p>The contributor does not agree with the preferred or alternative options and suggests no alternative options. <b>(95)</b></p>	<p>Comments noted.</p>	<p>No action required.</p>
<p>Growing our economy: Question 6</p>	<p>MGALA007 (Easter Langlee III) Galashiels</p>	<p>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</p>	<p>The site (MGALA007) was submitted as part of the 'MIR consultation' process. Following a full site assessment, it was concluded that the site should not be allocated for the following reasons:</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>

		<p>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. <b>(134)</b></p>	<p>The site is physically separated from the town by existing woodland. Impact on biodiversity is considered to be moderate due to scale but the following should be conserved: trees &amp; hedges, adjacent woodland.</p> <p>There is considerable archaeology within the north east corner of the site which would require to be avoided. The site is identified as being constrained in the Landscape Capacity Study as it is in a valley which is detached from the settlement; it is separated by a lip of land from the Tweed valley; the proximity of the waste disposal site and the overhead lines which currently fragment the site with wayleaves. The development of this site would require significant improved road access which would require land outwith the control of the applicant but could be considered for longer term development purposes.</p> <p>The following would require detailed investigation: ROW to S, the potentially contaminated land of the waste disposal site to the east, the gas hazard pipelines and their protection zones, electricity pylons. It is not considered the site should be included within the MIR/LDP2.</p>	
Growing our	BGALA006	SEPA advise that this site is located immediately	Comments noted.	It is recommended



<p>economy: Question 6</p>	<p>(Land at Winston Road I) Galashiels</p>	<p>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. <b>(119)</b></p>	<p>The site was included within the MIR as a preferred option for business and industrial development. SEPA were previously consulted at the 'Pre-MIR' stage and their advice was taken on board and incorporated within the site requirements. The following site requirement was attached in respect of odour: 'Odour from the nearby Sewage Treatment Works to be mitigated'. In view of these comments, it is considered that the site requirement should now read: 'Odour from the nearby Sewage Treatment Works to be mitigated <u>in discussion with the Council's Environmental Health Officer</u>'.  SEPA's comments in respect of the need for care to be taken not to damage the river banking as part of any development should be added as an additional site requirement.  The need for a Flood Risk Assessment is included as a site requirement.  SEPA's comments in respect of bridge and culvert structures within and adjacent to the site should be added as an additional site requirement.</p>	<p>that the Council agrees to update the site requirement attached to (BGALA006) to read as follows: 'Odour from the nearby Sewage Treatment Works to be mitigated <u>in discussion with the Council's Environmental Health Officer</u>'.  It is recommended that the Council agrees to add a further site requirement stating the following 'Care should be taken not to damage the river banking as part of any development' as well as 'Consideration must be given to bridge and culvert structures within and adjacent to the site'.  No further action is required.</p>
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			SEPA's comments in respect of surface water and water environment considerations are suitably dealt with within the site requirements detailed at the MIR stage.	
Growing our 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. <b>(149)</b>	Comments noted. Consultation with the Economic Development Section of the Council influences the level of employment land allocated and its location within the Local Development Plan. There has been an identified need in the Central Borders which has resulted in the proposed allocation of sites in Galashiels and Hawick. There has been no identified need within Walkerburn although there is an established need in other areas of Tweeddale.	No action required.
Growing our 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. <b>(197)</b>	Support noted.	No action required.
Growing our 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. <b>(199)</b>	The Council would consult with the Scottish Environment Protection Agency (SEPA) as well as the River Tweed Commission and The Tweed Foundation where applicable. The River Tweed Commission is the organisation responsible for maintaining and protecting the population of native fish species. The Tweed Foundation promotes environmental protection and improvement by conserving and	No action required.

			enhancing all species of freshwater fish and their environments in the Tweed District.	
Growing our 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. <b>(213)</b>	Comments noted. In respect of biodiversity risk, the site requirement within the MIR stated the following: ‘Assessment of ecology impacts and provision of mitigation, as appropriate. This is considered to be appropriate.	No action required.
Growing our 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. <b>(305)</b>	The Council supports the aspirations for a bypass around Selkirk on the A7, this is confirmed within Policy IS4: Transport Development and Infrastructure. This has not yet, however, been supported by the Scottish Government by means of funding. The Council considers it would be inappropriate to allocate sites for development to the east of the settlement which may in the future impinge upon and undermine any future options for a bypass at this location.	No action required.
Growing our 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	The allocation of land for business and industrial development is established through detailed liaison	No action required.

		<p>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. <b>(73)</b></p>	<p>with the Council’s Economic Development Section and is based upon demand assessment established through enquiries for business development. Furthermore, the Council undertakes an Employment Land Audit annually to monitor the take up and availability of business and industrial land across the Borders.</p>	
<p>Growing our economy: Question 6</p>	<p>General – Tweedbank/ Lowood</p>	<p>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 seems to indicate that the housing market at this location faces extremely challenging issues which</p>	<p>This site was formally allocated for mixed use development through the process of the Housing Supplementary Guidance as part of the Local Development Plan 2016. The principle of mixed use development at this location has therefore been established and is not now in question. The Council is in the process of preparing Supplementary Planning Guidance for the site, which will go through a process of public consultation. This is the avenue for commenting further on the development of this site. However, it must be accepted that the principle of development cannot now be questioned.</p>	<p>No action required.</p>

		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 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. <b>(92)</b>		
Growing our 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. <b>(236)</b>	Comments noted.	No action required.

## 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	Proposed Response to Main Issues Raised	Recommendation
Growing our economy: Question 6	Tweeddale Business and Industrial Land	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. <b>(155)</b>	Comments noted. The council has identified that there is a shortage of business and industrial land in the Northern HMA. The SESplan requires strategic growth in the Scottish Borders to be directed to three Strategic Development Areas (SDA) in Berwickshire, central Borders, and western Borders. The western SDA covers Walkerburn but does not include Eddleston. As part of the Development Options Study carried out by LUC, areas were identified by the consultants in Eddleston that would be suitable for housing but no sites were identified for business and industrial land. Eddleston is constrained in places west of the A703 due to the Eddleston Water flood plain. Walkerburn does have a regeneration site allocated in the Local Development plan site zR200 which may be able to accommodate some business and industrial land. There is challenges to finding more land in Walkerburn mainly due to its topography to the North of the A72 there is steep topology and to the South of the A72 its constrained by	No further action required.

			<p>the road and the River Tweed and its flood plain.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation and following further investigation it is recommended that a site for employment – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
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## 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	Proposed Response to Main Issues Raised	Recommendation
Eshiels	MESH1001, Land at Eshiels I & MESH1002, Land at Eshiels II	The contributor makes reference to a separate representation made (91) which covers their objection concerns to the sites MESH1001 and MESH1002. All the points raised in submission (91) are covered below. <b>(112)</b>	Comments noted.	No further action required at this time.
Eshiels	MESH1001, Land at Eshiels I & MESH1002, 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 (MESH1001 and MESH1002). 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</p>	See responses below relating to sites MESH1001 and MESH1002.	No further action required at this time.



		development is being acknowledged with allocations for 95 units in the current LDP being proposed for removal by the Council. The designation of large sites as 'preferred', when landowner/developer willingness is unknown may be regarded as premature. <b>(317)</b>		
Eshiels	MESHI001, Land at Eshiels I	The contributor confirms part ownership of (MESHI001) and supports the inclusion within the MIR. <b>(21)</b>	<p>Comments and support noted.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESHI001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESHI001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase</p>	It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH001 at this location.

			<p>order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESHI001, Land at Eshiels I	The contributor supports the inclusion of this site. <b>(283)</b>	<p>Support noted.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESHI001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH001 Land at Eshiels, is</p>	<p>It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH001 at this location.</p>

			<p>taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH1001, Land at Eshiels I, Eshiels	<p><u>General:</u></p> <p>The contributor objects to the inclusion of (MESH1001) within the MIR. <b>(189)</b></p> <p>The contributor states that the population density of the Eshiels development alone has 30% households per hectare. <b>(276)</b></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. <b>(20)</b></p> <p>The contributor highlights that the supporting document makes reference to a sawmill at Eshiels, which has not existed for over 20 years. <b>(150)</b></p> <p>There are inconsistencies between the proposals and existing SBC policies. <b>(166)</b></p> <p>The contributor states that SBC should not try to</p>	<p>The SESPlan requires strategic growth in the Scottish Borders to be directed to three Strategic Development Areas (SDA), in the Central Borders, the Western Borders and the Eastern Borders.</p> <p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that <i>"it is not anticipated the LDP2 will require a significant number of new housing sites"</i>. The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>It should also be noted that Scottish</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>

		<p>concentrate so many new developments around Peebles. Instead it should be trying to grow the economy around the train corridor leading to Galashiels. <b>(188)</b></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. <b>(201)</b></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. <b>(249)</b></p> <p>The contributor states that the suggestion of a mixed use conurbation in Eshiels is absurd. <b>(276)</b></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. <b>(205)</b></p>	<p>Planning Policy requires Local Development Plans to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>It should be noted that a Development Options Study was undertaken to identify and assess options for housing and employment land in the Western Strategic Development Area, centred on the central Tweeddale area. This was due to a number of physical and infrastructure constraints within the central Tweeddale area. The study identified a number of potential short and long term housing options as well as sites for business/industrial use. Site MESH1001 was one of the sites identified in that study.</p> <p>It should be noted that the site was identified as a Mixed Use site and the MIR set out a number of site requirements including that a Masterplan would be required in taking the site forward.</p>	
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			<p>It should be noted that paragraph 40 of Scottish Planning Policy requires: <i>“spatial strategies within development plans to promote a sustainable pattern of development appropriate to the area. To do this decisions should be guided by the following policy principles: optimising the use of existing resource capacities, particularly by co-ordinating housing and business development with infrastructure investment including transport, education facilities...”</i>.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>It should be noted that whilst the site is currently in agricultural use, the land is not identified as Prime Quality Agricultural Land. The</p>	
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			<p>identification of some greenfield / agricultural land is inevitable.</p> <p>In relation to the comment regarding to reference to a sawmill at Eshiels, it should be noted that this is an Ordinance Survey issue and is outwith the control of the Council. Updates on the Ordinance Survey base maps will be undertaken in due course.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is</p>	
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			<p>taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH1001, 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 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. <b>(91)</b></p>	<p>Whilst access to sewage facilities may currently be an issue, upgrades can overcome that issue.</p> <p>A site is effective under the terms of the Planning Advice Note (PAN) 2/2010 if it can be developed within the programme period. The Council undertakes an annual Housing Land Audit that monitors the effectiveness of housing land. This will continue to be used to assess the appropriate allocations in the plan.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>

			<p>existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH1001, Land at Eshiels I, 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</p>	<p>The 2001 Census, Travel to Work Data found that only 20% of Peebles resident employed adults worked in Edinburgh and of these 92% were car drivers or passengers, 6% used the bus and 2% used other transport means</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan,</p>



		<p>itself rather than export the issue to other areas. <b>(108)</b></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. <b>(141)</b></p>	<p>(including motorbikes).</p> <p>It should also be noted that the Council are required to identify a generous supply of land to meet identified housing need (including affordable housing) across the Strategic Development Areas. Failure to meet this requirement may result in development sites coming forward through the Development Management process and/or the Planning Appeals process.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is</p>	<p>but instead allocate a much reduced employment site - BESH1001 at this location.</p>
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			recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.	
Eshiels	MESH1001, Land at Eshiels I, 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. <b>(91)</b></p>	<p>It is noted that the site is within close proximity to Peebles, which is 2 miles to the west. However, the close proximity to Peebles, including the cycle path along the former railway line, provides access to a wider range of services, employment and public transport opportunities. Furthermore the Main Issues Report (MIR) notes that: <i>“Improvements to the road network and public transport must continue to be supported”</i>.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for</p>	It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.

			<p>development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH1001, Land at Eshiels I, Eshiels	<p><u>Coalescence:</u></p> <p>The contributor states that in the event that both (MESH1001 and MESH1002) are developed, there</p>	<p>Comments noted.</p> <p>It is acknowledged that the Main Issues Report (MIR) identified two sites for potential mixed use</p>	<p>It is recommended that the Council agree not to allocate site</p>

		<p>would be significant coalescence of development in this location on the north side of the River Tweed with consequent detrimental impact upon the SLA. <b>(91)</b></p>	<p>development; however, it is not considered there would be evidence of coalescence.</p> <p>However, following the MIR public consultation, and as a result of further consideration on the matter, it is proposed that site MESH1002 will not be taken forward into the Proposed Local Development Plan as a mixed use site. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>In addition, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p>	<p>MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>
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			Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.	
Eshiels	MESH1001, Land at Eshiels I, Eshiels	<p><u>Surrounding views/key receptors/setting:</u></p> <p>The contributors object to the inclusion of (MESH1001), including some of the following concerns; impact upon the surrounding views, peace and tranquillity of the area. <b>(31, 33, 34, 37, 43, 64, 76, 83, 98, 140)</b></p> <p>The contributor raises concerns regarding the impact of the development upon the tranquillity of Peebles and the surrounding countryside. <b>(205)</b></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. <b>(97)</b></p>	<p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development.</p> <p>The MIR in paragraph 3.3 notes that <i>“it is not anticipated the LDP [Local Development Plan] 2 will require a significant number of new housing sites”</i>. The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses. In addition, it should be noted that the Council are</p>	It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.

		<p>Contributor states that the area between Eshiels and Cardrona is exceptionally beautiful. <b>(167)</b></p> <p>The contributor raises concerns that the views from tourist cottage(s) will change drastically and objects to the development. <b>(49, 96)</b></p> <p>Contributor raises concerns regarding the impact upon the views/landscape/scenery. <b>(50, 52,53, 149, 202, 239, 243, 320, 233)</b></p> <p>The development would result in the loss of existing views from many of the current houses in Eshiels. <b>(90)</b></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. <b>(91)</b></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. <b>(46)</b></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. <b>(249)</b></p> <p>The contributor states that the rural development plan talks of the importance of the open and sweeping scenic vistas. <b>(276)</b></p>	<p>also required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas.</p> <p>Scottish Planning Policy requires LDP's to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p>	
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		<p>The contributor states that people enjoy the 'wilderness' experience and this must be valued. <b>(243)</b></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. <b>(227)</b></p> <p>Contributor raises concerns regarding the visual impact of the development. <b>(197)</b></p>	<p>In respect to comments regarding the potential impacts on tourism and on Glentress; it should be noted that VisitScotland and the Forestry Commission have been consulted regarding the potential allocation of this site within the Local Development Plan and neither have objected to its potential allocation.</p> <p>With regards to comments relating to landscape and that the site is located within the Tweed Valley Special Landscape Area, it should be noted that neither Scottish Natural Heritage or the Council's Landscape Section objected to the potential inclusion of the site within the Local Development Plan.</p> <p>It should be noted that the issue regarding loss of a view is not a material consideration in Planning.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment</p>	
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			<p>Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH1001, Land at Eshiels I, Eshiels	<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. <b>(46, 69)</b></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</p>	<p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development.</p> <p>The MIR in paragraph 3.3 notes that <i>“it is not anticipated the LDP [Local Development Plan] 2 will require a significant number of new housing</i></p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this</p>



		<p>houses within Eshiels would be more appropriate. <b>(300)</b></p> <p>The contributor highlights that Eshiels is not an existing settlement within the LDP and that housing/industrial premises would swamp Eshiels. <b>(139)</b></p> <p>The contributor states that the development would have a negative impact upon the Tweed Valley. <b>(188)</b></p> <p>The contributor states that having a huge development at the entrance to Peebles will take away from the appeal of Peebles. <b>(186)</b></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. <b>(139)</b></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. <b>(51)</b></p> <p>The contributor states that the development would be out of scale/character for the area. <b>(90, 98, 140, 142, 150, 158, 166, 178, 179, 180, 185, 188, 186, 194, 198, 201, 241, 268, 269, 276, 298, 207)</b></p>	<p><i>sites</i>". The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses. In addition, it should be noted that the Council are also required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas.</p> <p>Scottish Planning Policy requires LDP's to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many</p>	<p>location.</p>
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		<p>The contributor states that the development would severely detract from the current atmosphere and attractiveness of the area. <b>(149)</b></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. <b>(172)</b></p> <p>The site is out of character and contrary to Policy PMD4 and LDP2MIR para 3.6. <b>(172, 185, 186, 198, 207, 216)</b></p> <p>The contributor states that the site is out of proportion. <b>(216)</b></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. <b>(98)</b></p> <p>The contributor states that the development would destroy the character of the area. This would be an unwelcome urbanisation of the countryside</p>	<p>issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>In respect to comments regarding to potential impacts on tourism and on Glentress; it should be noted that VisitScotland and the Forestry Commission have been consulted regarding the potential allocation of this site within the Local Development Plan and neither have objected to its potential allocation.</p> <p>Furthermore, it should be noted that the Council's Roads Planning Section and Network Manager have been consulted. It is noted that neither of these consultees objected to the potential allocation of the site.</p> <p>With regards to comments relating to landscape and that the site is located within the Tweed Valley Special Landscape Area, it should be noted that neither Scottish Natural Heritage nor the Council's Landscape Section objected to the potential inclusion of the site within the Local Development Plan.</p> <p>In respect to comments that the site would be contrary to LDP Policy PMD4 Development Outwith Development Boundaries, it should</p>	
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		<p>which will contribute to destroying the uniqueness of the Scottish Borders countryside. <b>(52)</b></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. <b>(91)</b></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. <b>(91)</b></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. <b>(166)</b></p> <p>The contributor raised concerns regarding the impact upon the Special Landscape Area. <b>(172,</b></p>	<p>be noted that had the site been allocated, the site and Eshiels would be included within a new Development Boundary.</p> <p>In respect to comments regarding amenity, it should be noted that Policy HD3 Protection of Residential Amenity would be relevant in the consideration of any planning application on the site.</p> <p>In addition, it is noted that the MIR sets out a number of site requirements that include a requirement for a Masterplan in advance of taking site MESH1001 forward for development.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p>	
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	<p><b>178, 179, 185, 186, 239, 207, 216)</b></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. <b>(155)</b></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. <b>(91)</b></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. <b>(108)</b></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</p>	<p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
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	<p>at Eshiels and use it as a model for placemaking in other parts of the Borders. <b>(139)</b></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. <b>(154)</b></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. <b>(155)</b></p> <p>The contributor considers that the proposed development would result in the area becoming urbanised. <b>(271)</b></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. <b>(166)</b></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. <b>(201)</b></p> <p>The contributor states that making Eshiels a much bigger satellite of Peebles will destroy the countryside feel of the Western Borders. <b>(223)</b></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</p>		
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		<p>surrounding area. <b>(266)</b></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. <b>(292)</b></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. <b>(292)</b></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. <b>(293)</b></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. <b>(298)</b></p> <p>The contributor raises concerns at the loss of the countryside. <b>(268)</b></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. <b>(257)</b></p>		
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	<p>The contributor states that the proposed development seems at odds with the landscape/out of proportion. <b>(239, 243)</b></p> <p>The contributor states that the urbanisation would be most unwelcome in this rural economy. <b>(216)</b></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. <b>(217)</b></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. <b>(229)</b></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. <b>(233)</b></p> <p>The contributor raises concerns regarding the over development in the vicinity of Eshiels. <b>(206)</b></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</p>		
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		<p>side of the road. <b>(197)</b></p> <p>The contributor raises concerns regarding the number of units proposed, which would swamp the existing hamlet and cause logistical problems. <b>(197)</b></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. <b>(197)</b></p> <p>Current policy EP5 helps to protect against inappropriate development in the Special Landscape Area. These proposals are inappropriate and should be rejected. <b>(318)</b></p> <p>The contributor does not consider that the siting of industrial buildings alongside housing is appropriate. <b>(149)</b></p>		
Eshiels	MESHI001, Land at Eshiels I, Eshiels	<p><u>Tourism:</u></p> <p>The contributor objects to the inclusion of (MESHI001) and the potential impact upon tourism. <b>(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)</b></p> <p>The contributor states that the area will become less attractive to walkers and cyclists. <b>(188)</b></p> <p>The contributor raises concerns that such a development will make Glentress less appealing if it is surrounded by housing and business estate. <b>(186)</b></p>	<p>The success of outdoor recreational facilities at Glentress has helped tourism in the area and helps the status of Peebles as a recognised buoyant town centre. Peebles remains a very attractive area for prospective house builders partly due to its proximity to Edinburgh.</p> <p>The Main Issues Report (MIR) recognises that the built and natural heritage are major component parts of the attractiveness of the Scottish Borders which must be protected and enhanced. There are a large number of listed buildings,</p>	<p>It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH001 at this location.</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. <b>(76)</b></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. <b>(52, 69, 90, 139, 188)</b></p> <p>The contributor raises concerns that Glentress has an international reputation as a centre of excellence for mountain biking. <b>(139)</b></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. <b>(32)</b></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. <b>(51)</b></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. <b>(59)</b></p>	<p>conservation areas, landscape and biodiversity designations and opportunities must continue to be explored to capitalise on these assets in the interests of tourism and economic development. It is acknowledged that the Plan 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.</p> <p>It should be noted that Scottish Natural Heritage, VisitScotland and the Forestry Commission have all been consulted regarding the potential allocation of site MESH1001 within the Local Development Plan. However, none objected to its potential allocation.</p> <p>In addition, it is noted that the MIR sets out a number of site requirements that include a requirement for a Masterplan in advance of taking the site forward for development.</p> <p>It should also be noted that in relation to LDP policy ED7 Business, Tourism and Leisure Development in the Countryside, that policy aims to allow for</p>	
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		<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. <b>(90)</b></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. <b>(154)</b></p> <p>The contributor raises concerns that the development will remove a sense of countryside experience which will impact negatively on tourism. <b>(155)</b></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. <b>(166)</b></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</p>	<p>appropriate employment generating development in the countryside whilst protecting the environment and to ensure that business, tourism and leisure related developments are appropriate to their location. It is not considered that any of the potential sites identified within the MIR is contrary to that policy.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is</p>	
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		<p>attraction of this area and undermine ongoing investment in the recreational facilities. <b>(167)</b></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. <b>(185)</b></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. <b>(201)</b></p> <p>The contributor raises concerns regarding the impact of the development upon Glentress for biking. The development would take away the peacefulness. <b>(205)</b></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. <b>(246)</b></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. <b>(276)</b></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. <b>(292)</b></p>	<p>likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
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		<p>The contributor raised concerns regarding the impact upon Glentress/Tweed Valley. <b>(268, 269, 257, 271, 300)</b></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. <b>(239)</b></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. <b>(207)</b></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. <b>(216)</b></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. <b>(216)</b></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. <b>(30)</b></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. <b>(206)</b></p>		
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		<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. <b>(198)</b></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. <b>(318)</b></p>		
Eshiels	MESH1001, Land at Eshiels I, Eshiels	<p><u>Land economics:</u></p> <p>Contributor raised concerns at the inclusion of (MESH1001), in respect of land economics. <b>(24)</b></p>	<p>This site was identified through an independent study that 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 Main Issues Report (MIR).</p> <p>It should be noted that deliverability of the potential sites was considered, in terms of access and infrastructure constraints. Developer interests were contacted at two points in the study: initially to gather an understanding of the types of sites likely to be of interest; and later</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>

			<p>to consider viability of the potential development sites.</p> <p>It is therefore not considered that there are issues relating to land economics that would prevent the site MESH1001 from coming forward.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council</p>	
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			<p>undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	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. <b>(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)</b></p> <p>Concerns that the development will create a lot of extra traffic as people will inevitable drive to Peebles for various services. <b>(46)</b></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. <b>(202)</b></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.</p>	<p>It should be noted that it is not intended to allocate all of the sites identified within the Main Issues Report within the Proposed Local Development Plan.</p> <p>Whilst the primary responsibility for operating the development planning system for the Scottish Borders lies with the Council, Circular 6/2013 Development Planning states that all interests should be engaged as early and as fully as possible. In addition that document also states “<i>key agencies are under a specific duty to co-operate in the preparation of development plans</i>”; this includes Scottish Natural Heritage, Scottish Environmental Protection Agency, Scottish Water and NHS (Health Board). The Council have consulted with all key agencies throughout the Local Development Plan process and will continue to do so. This then allows key agencies to plan according to their needs and</p>	<p>It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>

		<p><b>(271)</b></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. <b>(235)</b></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. <b>(318)</b></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. <b>(108)</b></p>	<p>demands also.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>Furthermore, it should be noted that the Council's Roads Planning Section and Network Manager have been consulted. It is noted that neither of these consultees objected to the potential allocation of the site MESH1001.</p> <p>In respect to comments regarding school transport, it should be noted that transport is provided to pupils who live over 2 miles from their catchment school in primary and to those who live over 3 miles away from their catchment school in secondary.</p>	
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			<p>It should be noted that the site was identified as a Mixed Use site with housing. Furthermore the site requirements set out in the Main Issues Report stated that a Masterplan would be required in taking the site forward.</p> <p>In addition, it is not anticipated that any of the mixed use sites to be identified in the Main Issues Report would have a negative impact on Peebles.</p> <p>Whilst Eshiels may not have a pub or a shop, it has good access to employment and services, and there is the potential access to public transport to be improved on as Eshiels is located just off the A72. In addition, Eshiels is also located in close proximity to the Walkerburn to Peebles multi use path. It is also noted that a public footpath runs along the A72 into Peebles, although it is noted that this is on the southern side of the road. A site requirement also sets out a requirement for options for improvements to the existing public transport infrastructure will need to be explored, as well as the suitability of pedestrian provision on the A72.</p> <p>However, in light of the consultation responses received during the Main</p>	
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			<p>Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
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Eshiels	MESH1001, 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. <b>(20)</b></p>	<p>In relation to comments regarding noise and air quality, these are detailed issues that would be considered at planning application stage. However, it should be noted that neither SEPA nor Environmental Health have objected to the site on the basis of noise or air quality.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>
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			likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.	
Eshiels	MESH1001, 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. <b>(20, 23, 69, 141, 145, 155, 166)</b></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. <b>(38)</b></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. <b>(46, 155, 172, 186, 198, 205, 207, 216, 239, 269)</b></p>	<p>It should be noted that it is not intended to allocate all of the sites identified within the Main Issues Report within the Proposed Local Development Plan.</p> <p>Whilst the primary responsibility for operating the development planning system for the Scottish Borders lies with the Council, Circular 6/2013 Development Planning states that all interests should be engaged as early and as fully as possible. In addition that document also states “<i>key agencies are under a specific duty to co-operate in the preparation of development plans</i>”; this includes Scottish Natural Heritage, Scottish Environmental Protection Agency, Scottish Water and NHS (Health Board). The Council have consulted with all key agencies throughout the Local Development Plan process and will continue to do so. This then allows key agencies to plan</p>	It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.

		<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). <b>(53, 59, 83, 90, 139, 149, 179, 180, 194, 197, 201, 205, 252, 257, 292, 300, 209, 217, 229, 235)</b></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. <b>(155)</b></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. <b>(91)</b></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</p>	<p>according to their needs and demands also.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>NHS Borders have stated that they will continue to engage with SBC colleagues to provide primary care and public health input to the wider planning process including the creation of the next Scottish Borders Council Local Development Plan early in its preparation cycle as part of a Health in All Policies approach.</p> <p>It should be noted that Scottish Water were consulted as part of the site assessment process undertaken for site MESH1001. In addition, whilst access to sewage facilities may currently be an issue,</p>	
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		<p>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. <b>(91)</b></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. <b>(108)</b></p> <p>Concerns are raised that future road expansion will take place along the old railway tracks, which are currently used for walking/cycling. <b>(108)</b></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. <b>(139)</b></p> <p>The contributor raises concerns regarding the lack of a safe footpath between Eshiels and Peebles. <b>(239)</b></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</p>	<p>upgrades can overcome that issue.</p> <p>Furthermore, it is noted that the Council's Education, Archaeology, and Roads Planning sections, as well as Historic Environment Scotland and Scottish Natural Heritage have been consulted. It is noted that none of these consultees objected to the potential allocation of the site MESH1002.</p> <p>In respect to comments regarding school transport, it should be noted that transport is provided to pupils who live over 2 miles from their catchment school in primary and to those who live over 3 miles away from their catchment school in secondary.</p> <p>It should be noted that the site was identified as a Mixed Use site with housing. Furthermore the site requirements set out in the Main Issues Report stated that a Masterplan would be required in taking site MESH1001 forward.</p> <p>In addition, it is not anticipated any of the mixed use sites to be identified in the Proposed Plan will have a negative impact on the economy of Peebles.</p> <p>Whilst Eshiels may not have a pub or a shop, it has good access to</p>	
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		<p>on the quality of the roads between Eshiels and Edinburgh, as well as increasing car miles. <b>(185)</b></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. <b>(185)</b></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. <b>(185)</b></p> <p>The contributor states that there is only 1 ambulance covering the area. <b>(185)</b></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. <b>(201)</b></p> <p>The contributor states that mixed use is not appropriate for the site, due to the narrow access roads. <b>(273)</b></p> <p>The contributor states that commitment to extensive infrastructure improvements are required before any further significant development can take place. <b>(269)</b></p>	<p>employment and services, and there is the potential access to public transport to be improved on as Eshiels is located just off the A72. In addition, Eshiels is also located in close proximity to the Walkerburn to Peebles multi use path. It is also noted that a public footpath runs along the A72 into Peebles, although it is noted that this is on the southern side of the road. A site requirement set out a requirement for options for improvements to the existing public transport infrastructure to be explored, as well as the suitability of pedestrian provision on the A72.</p> <p>The 2001 Census, Travel to Work Data found that only 20% of Peebles resident employed adults worked in Edinburgh and of these 92% were car drivers or passengers, 6% used the bus and 2% used other transport means (including motorbikes).</p> <p>This site was identified through an independent study that 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 Main Issues Report (MIR).</p> <p>It should be noted that deliverability</p>	
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		<p>The contributor raises concerns regarding the car parking facilities within Peebles and that it cannot cope with the current population. <b>(252)</b></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. <b>(243)</b></p> <p>The proposal would encourage a large amount of school car traffic. <b>(241)</b></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. <b>(239)</b></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). <b>(213)</b></p> <p>The contributor states that there is insufficient road and water infrastructure. <b>(235)</b></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</p>	<p>of the potential sites was considered, in terms of access and infrastructure constraints. Developer interests were contacted at two points in the study: initially to gather an understanding of the types of sites likely to be of interest; and later to consider viability of the potential development sites.</p> <p>In relation to effectiveness, a site is effective under the terms of the Planning Advice Note (PAN) 2/2010 if it can be developed within the programme period. The Council undertakes an annual Housing Land Audit that monitors the effectiveness of housing land. This will continue to be used to assess the appropriate allocations in the plan.</p> <p>It is therefore not considered that there are issues relating to land economics that would prevent the site from coming forward.</p> <p>Comments regarding the measures to support sustainable transport in the form of safe cycling and walking to Peebles, along the A72 are considered through the site requirements set out in the Main Issues Report.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation,</p>	
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		<p>negative effect to the vibrancy and economic health of Peebles. <b>(197)</b></p> <p>The contributor states that Eshiels has no amenities and residents will go into Peebles and head to Edinburgh. <b>(197)</b></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. <b>(91)</b></p>	<p>including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH1001,	<u>Ribbon development and green belt:</u>	It should be noted that it is not	It is recommended

	<p>Land at Eshiels I, Eshiels</p>	<p>The contributors raise concerns that development on this site would be ribbon development. <b>(23, 139, 149, 150, 155, 172, 178, 179, 185, 186, 197, 198, 205, 241, 269, 276, 292, 207, 216, 229)</b></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. <b>(180)</b></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. <b>(205)</b></p> <p>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. <b>(91)</b></p>	<p>intended to allocate all of the sites identified within the Main Issues Report within the Proposed Local Development Plan.</p> <p>In the consideration of any site for inclusion in the Main Issues Report, a full site assessment was carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, and Scottish Natural Heritage) are incorporated into that assessment. This rigorous site assessment process then allows identification of the best sites possible.</p> <p>It is not considered that development at this location would result in ribbon development or coalescence of the settlements within the Tweed Valley.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible</p>	<p>that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>
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			<p>due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH1001, Land at Eshiels I, Eshiels	<p><u>Health &amp; wellbeing/amenity of existing residents:</u></p> <p>The contributor states that the development of (MESH1001) would impact upon the health and well being of the existing residents. <b>(43)</b></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. <b>(90, 95)</b></p>	<p>It should be noted that the site is located within the Strategic Green Network as set out in Local Development Plan policy EP12 Green Networks. The aim of Green Networks are to assist in supporting sustainable economic growth, tourism, recreation, the creation of an environment that promotes a healthier-living lifestyle, and the</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site -</p>

			<p>protection and enhancement of biodiversity, and have the potential to improve water quality, promote flood protection and reduce pollution.</p> <p>It is therefore not considered that development at this location would have a negative impact on the health and wellbeing of existing residents.</p> <p>In relation to comments regarding noise, light and dust pollution, these would be issues that would be considered at planning application stage.</p> <p>In respect to comments regarding amenity, it should be noted that Policy HD3 Protection of Residential Amenity would be relevant in the consideration of any planning application on site MESH1001.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible</p>	BESH1001 at this location.
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			<p>due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH1001, 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. <b>(51, 69, 90, 276)</b></p> <p>The contributors raise concerns regarding the impact of the development upon the Eshiels dark sky environment. <b>(139, 149, 155, 186, 197, 292)</b></p>	<p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that "<i>it is not anticipated the LDP2 will require a significant number of new housing sites</i>". The purpose of the MIR was to identify a</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site -</p>

			<p>number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>However the Council are aware that the lighting of roads, footpaths, domestic and commercial property should be an integral element of all new development proposals at the outset and not, as has sometimes been the case in the past, addressed as an afterthought. Furthermore it is possible to reduce many of the negative effects of lighting through careful design and planning, using lighting only where and when necessary, using an appropriate strength of light and adjusting light fittings to direct the light to where it is required. It is acknowledged that illumination should be appropriate to the surroundings and character of the area as a whole.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that</p>	BESHI001 at this location.
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			<p>upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	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. <b>(69)</b></p> <p>The contributor states that the development would cause the destruction of ancient pastures. <b>(108)</b></p>	<p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that "<i>it is not anticipated the LDP2 will require a significant number of new housing sites</i>". The</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced</p>

		<p>The contributor states that the development would result in the loss of prime quality agricultural land. <b>(30, 149, 166, 205, 292)</b></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. <b>(155)</b></p> <p>The site will result in the removal of agricultural land counter to Policy ED10. <b>(172, 185, 186, 198, 207, 216)</b></p> <p>Contributor raises concerns regarding the loss of green belts and agricultural land. <b>(241)</b></p>	<p>purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified.</p> <p>It should be noted that whilst the site is currently in agricultural use for grazing, the land is not identified as Prime Quality Agricultural Land. It is noted that the identification of some greenfield / agricultural land is inevitable.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that</p>	<p>employment site - BESH1001 at this location.</p>
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			<p>upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	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. <b>(69, 186)</b></p> <p>The contributor fears this small rural community may be permanently scarred by this proposal. <b>(201)</b></p>	<p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that "<i>it is not anticipated the LDP2 will require a significant number of new housing sites</i>". The</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced</p>

			<p>purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>It is noted that the MIR sets out a number of site requirements that include a requirement for a Masterplan in advance of taking site MESH1001 forward for development.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is</p>	<p>employment site - BESH1001 at this location.</p>
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			<p>taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	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. <b>(88)</b></p>	<p>It should be noted that the Scottish Environment Protection Agency (SEPA) were consulted as part of the site assessment process and as a result the following site requirement was included in the Main Issues Report for the site: “<i>A maintenance buffer strip of at least 6 metres must be provided between the watercourse and any built development. Additional water quality buffer strips may also be required</i>”.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>

			<p>existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	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 Borders. <b>(90)</b></p>	<p>It is not intended to allocate all of the sites identified within the Main Issues Report within the Proposed Local Development Plan.</p> <p>The SESPlan requires strategic growth in the Scottish Borders to be</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan,</p>

			<p>directed to three Strategic Development Areas (SDA) in the Central Borders, the Western Borders and the Eastern Borders.</p> <p>It should also be noted that Scottish Planning Policy requires Local Development Plans to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system. In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape. In doing this rigorous site assessment process, the best sites possible are identified.</p>	<p>but instead allocate a much reduced employment site - BESH1001 at this location.</p>
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			<p>It should be noted that a Development Options Study was undertaken to identify and assess options for housing and employment land in the Western Strategic Development Area, centred on the central Tweeddale area. This was due to a number of physical and infrastructure constraints within the central Tweeddale area. The study identified a number of potential short and long term housing options as well as sites for business/industrial use. Site MESH1001 was one of the sites identified in that study.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land</p>	
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			<p>for employment use, it is recommended that a reduced site at this location for employment only – site BESHI001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESHI001, Land at Eshiels I, Eshiels	<p><u>Flood risk:</u></p> <p>The contributor states that the development would increase flooding risk for the housing and fields below the road. <b>(90, 235)</b></p> <p>The contributor states that the development may lead to flooding of areas to the south of the A72. <b>(166)</b></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</p>	<p>It is not intended to allocate all of the sites identified within the Main Issues Report within the Proposed Local Development Plan.</p> <p>It should be noted that Scottish Environment Protection Agency (SEPA) and the Council's Flood and Coastal Management Team were consulted as part of the site assessment process undertaken for the site. Neither consultee have objected to the potential inclusion of the site within the Plan.</p> <p>In addition, the Main Issues Report included a site requirement for a Flood Risk Assessment to assess the risk from the Linn Burn and the</p>	<p>It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESHI001 at this location.</p>

	<p>moving slowly through the soil, run-off will be swifter and this will exacerbate flooding. <b>(108)</b></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. <b>(139)</b></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. <b>(150)</b></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. <b>(155)</b></p> <p>The contributor raises concerns regarding flood risk as a result of development on this site/surrounding area/roads. <b>(172, 198, 205, 269)</b></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 wet weather, 26 hectares of tarmac'd land would need significant investment in drainage for the whole area. <b>(185)</b></p> <p>The contributor states that significant flooding</p>	<p>small water course that flows adjacent to the site.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist</p>	
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		<p>takes place most years on (MESH1001) site. Question whether the Council intend to stipulate that the houses and businesses are built on stilts. <b>(298)</b></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. <b>(241)</b></p> <p>The contributor raises concerns regarding the potential for flooding from the hills into the fields. <b>(239)</b></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. <b>(207)</b></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. <b>(216)</b></p>	<p>in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH1001, 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. <b>(90, 139)</b></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. <b>(91)</b></p> <p>Contributor raises concerns regarding the</p>	<p>It should be noted that Scottish Water were consulted as part of the site assessment process undertaken for the site, and did not object to the potential allocation of the site. In addition, whilst access to sewage facilities may currently be an issue, upgrades can overcome that issue.</p> <p>However, in light of the consultation responses received during the Main</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>

		<p>problems of sewerage disposal/treatment from the site. <b>(172, 197, 198, 269, 293, 207, 216, 229, 235)</b></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. <b>(185)</b></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. <b>(318)</b></p> <p>Contributor raises concerns regarding septic tank waste and whether the existing treatment plant can cope with this amount of houses. <b>(197)</b></p>	<p>Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
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Eshiels	MESH1001, 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. <b>(90)</b></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 artefacts which remain buried. If building works is carried out many of the remains will be destroyed. <b>(194)</b></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. <b>(91)</b></p> <p>The contributor states that development may cause damage to the historic sites, buildings and artefacts close to the access road. <b>(108)</b></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. <b>(108)</b></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</p>	<p>It should be noted that the Council's Ecology Officer and Heritage and Design Officer, as well as Scottish Natural Heritage (SNH) and Historic Environment Scotland (HES) were consulted as part of the site assessment process undertaken for the site. It is noted that none of these consultees objected to the potential allocation of site MESH1001.</p> <p>It should be noted that the site was identified as a Mixed Use site and the MIR set out a number of site requirements including that a Masterplan would be required in taking the site forward. In respect to that requirement, Historic Environment Scotland have recommended that early consultation is undertaken with them.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>
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		<p>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. <b>(164)</b></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. <b>(167)</b></p> <p>The contributor raises concerns in respect of the archaeological impact of the new infrastructure on the local scheduled monuments. <b>(239)</b></p>	<p>Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH1001, 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. <b>(90)</b></p>	<p>The SESPlan requires strategic growth in the Scottish Borders to be directed to three Strategic Development Areas (SDA) in the Central Borders, the Western Borders and the Eastern borders.</p> <p>It should also be noted that Scottish Planning Policy requires Local Development Plans to allocate a range of sites which are effective or</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this</p>

			<p>expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system. In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape. In doing this rigorous site assessment process, the best sites possible are identified.</p> <p>Whilst Eshiels may not have a pub or a shop, it has good access to employment and services, and there is the potential access to public transport to be improved on as Eshiels is located just off the A72. In addition, Eshiels is also located in close proximity to the Walkerburn to Peebles multi use path. It is also</p>	location.
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			<p>noted that a public footpath runs along the A72 into Peebles, although it is noted that this is on the southern side of the road. A site requirement also sets out a requirement for options for improvements to the existing public transport infrastructure will need to be explored, as well as the suitability of pedestrian provision on the A72.</p> <p>In addition, the plan will continue to encourage and facilitate sustainable means of travel.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land</p>	
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			<p>for employment use, it is recommended that a reduced site at this location for employment only – site BESHI001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	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. <b>(91)</b></p> <p>The contributor states that the proposal would have a reduction of biodiversity counter to Policy EP3. <b>(172, 207)</b></p> <p>Contributors raise concerns including the following; impact upon local wildlife/ecology/biodiversity/TPO's <b>(108, 140, 167, 179, 185, 202, 239, 241, 216)</b></p> <p>The contributor raises concerns in respect of the environmental impact upon biodiversity. <b>(239)</b></p>	<p>It should be noted that the Council's Ecology Officer as well as Scottish Natural Heritage (SNH) and Scottish Environment Protection Agency (SEPA) were consulted as part of the site assessment process undertaken for site MESHI001. It is noted that none of these consultees objected to the potential allocation of the site MESHI001.</p> <p>In addition, the Main Issues Report included a number of site requirements including "<i>Protect and enhance the existing boundary features, where possible</i>", "<i>Assessment of ecology impacts and provision of mitigation, as appropriate</i>"; and "<i>Mitigation to</i></p>	<p>It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH001 at this location.</p>

		<p>The contributor raises concerns regarding the environmental impact from the development. <b>(197)</b></p>	<p><i>ensure no significant effect on River Tweed SAC/SSSI</i>.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist</p>	
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			in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.	
Eshiels	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. <b>(108)</b></p>	<p>It should be noted that the Council's Ecology Officer as well as Scottish Natural Heritage (SNH) and Scottish Environment Protection Agency (SEPA) were consulted as part of the site assessment process undertaken for the site. It is noted that none of these consultees objected to the potential allocation of the site MESHI001.</p> <p>In addition, the Main Issues Report included a number of site requirements including "Assessment of ecology impacts and provision of mitigation, as appropriate"; and "Mitigation to ensure no significant effect on River Tweed SAC/SSSI".</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment</p>	It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH001 at this location.

			<p>Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH1001, 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>It is noted that the MIR sets out a number of site requirements that include a requirement for a Masterplan in advance of taking site MESH1001 forward for development.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this</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 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 if 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 (MESH1002) 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. <b>(213)</b></p>	<p>unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	location.
Eshiels	MESH1001, Land at Eshiels I,	<p><u>Co-location issues:</u></p> <p>The contributor highlights that there may be co-</p>	<p>Comment noted.</p> <p>Co-location issues with the nearby Peebles waste water treatment</p>	It is recommended that the Council agree not to

	Eshiels	location issues, including odours, with the nearby Peebles waste water treatment works and the adjacent Eshiels recycling centre. <b>(91)</b>	<p>works and the adjacent Eshiels recycling centre would need to be investigated as part of any planning application.</p> <p>It should also be noted that as part of the site assessment undertaken for site MESH1001, SEPA have stated that there is unlikely to be an impact on the site from SEPA's perspective. Possible odour issues from the Sewage Treatment Works would be dealt with by Scottish Borders Council Environmental Health.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land</p>	allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.
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			<p>for employment use, it is recommended that a reduced site at this location for employment only – site BESH001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH001, Land at Eshiels I, Eshiels	<p><u>Suggested limitations on construction works:</u></p> <p>The contributor suggests that the following limitations are put on any construction work;</p> <ul style="list-style-type: none"> <li>- Sound barriers put in place between their property and the proposed construction works</li> <li>- Acceptable type and level of noise be decided upon, monitored and enforced by Environmental Health Officers on a regular basis</li> <li>- Environmental Health Officers to monitor the amount of light pollution on their property</li> <li>- Environmental Health officers to monitor the proposed construction site to ensure that the dust and smell levels</li> <li>- Request that vehicle movements on the small rural road be limited to specific traffic times and restricted number of vehicles that pass by</li> </ul>	<p>Building works by their very nature, generate noise and additional traffic etc. Planning permissions sometimes include conditions intended to minimise impacts, both during the construction phase and afterwards, during the life of the development. However, issues such as those raised would be dealt with at planning application stage if required.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following</p>	<p>It is recommended that the Council agree not to allocate site MESH001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH001 at this location.</p>

		<p>at any given time</p> <ul style="list-style-type: none"> <li>- 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. <b>(95)</b></li> </ul>	<p>further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH1001, Land at Eshiels I, Eshiels	<p><u>Access to an existing property:</u></p> <p>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</p>	<p>The Main Issues Report does not set out any access proposals in relation to the potential allocation of site MESH1E001. However, given the location of the contributor's</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within</p>

		<p>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. <b>(95)</b></p>	<p>property, it is not envisaged that any proposed access for site MESH1001 would impact on their property.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership)</p>	<p>the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>
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			<p>funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH1001, Land at Eshiels I, Eshiels	<p><u>De-value existing properties:</u> The contributor states that the proposal will devalue existing properties. <b>(98)</b></p>	<p>It should be noted that this is not a material planning consideration.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>



			<p>undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESHI001, Land at Eshiels I, Eshiels	<p><u>Design:</u></p> <p>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.</p> <p><b>(98)</b></p>	<p>It should be noted that the Council has produced Supplementary Planning Guidance (SPG) on Placemaking and Design to encourage good design and sustainable development in the Borders. This SPG relates to all housing tenures including affordable housing.</p> <p>In addition, it is noted that the MIR sets out a number of site requirements that include a requirement for a Masterplan in advance of taking the site forward for development.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the</p>	<p>It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>

			<p>existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH1001, Land at Eshiels I, Eshiels	<p><u>Carbon foot print/sustainability:</u></p> <p>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</p>	<p>It is not intended to allocate all of the sites identified within the Main Issues Report within the Proposed Local Development Plan.</p> <p>The SESPlan requires strategic growth in the Scottish Borders to be</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan,</p>

		<p>carbon footprint in the area. <b>(108)</b></p> <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. <b>(155)</b></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. <b>(172)</b></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. <b>(186)</b></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. <b>(198)</b></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. <b>(201)</b></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</p>	<p>directed to three Strategic Development Areas (SDA) in the Central Borders, the Western Borders and the Eastern Borders.</p> <p>It should also be noted that Scottish Planning Policy requires Local Development Plans to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system. In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape. In doing this rigorous site assessment process, the best sites possible are identified.</p>	<p>but instead allocate a much reduced employment site - BESH1001 at this location.</p>
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		<p>car miles. <b>(292)</b></p> <p>The contributor states that residents will need to drive to work in Edinburgh, adding to the traffic congestion and pollution. <b>(252)</b></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. <b>(241)</b></p> <p>The contributor raises concerns regarding the increased carbon emissions as a result of the development. <b>(239, 229)</b></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. <b>(207)</b></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. <b>(209)</b></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) <b>(216)</b></p> <p>The contributor raises concerns regarding the extended fossil fuel pollution as a result of the</p>	<p>In relation to the site assessment undertaken for the site, it should be noted that the Roads Planning Section have stated: "... <i>Options for improvements to the existing public transport infrastructure will need to be explored as will the suitability of pedestrian provision in the A72</i>".</p> <p>It is not considered that the majority of new residents that would live at Eshiels would be commuters travelling to Edinburgh. It should be noted that the 2001 Census, Travel to Work Data found that only 20% of Peebles resident employed adults worked in Edinburgh and of these 92% were car drivers or passengers, 6% used the bus and 2% used other transport means (including motorbikes).</p> <p>Whilst Eshiels may not have a pub or a shop, it has good access to employment and services, and there is the potential access to public transport to be improved on as Eshiels is located just off the A72. In addition, Eshiels is also located in close proximity to the Walkerburn to Peebles multi use path. It is also noted that a public footpath runs along the A72 into Peebles, although it is noted that this is on the southern side of the road. A site requirement also sets out a requirement for options for</p>	
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		<p>development. <b>(197)</b></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. <b>(108)</b></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. <b>(141)</b></p>	<p>improvements to the existing public transport infrastructure will need to be explored, as well as the suitability of pedestrian provision on the A72.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be</p>	
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			<p>envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	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. <b>(108)</b></p>	<p>Comments noted.</p> <p>Whilst, brownfield land is the first consideration when identifying additional sites, as a result of limited land availability there is pressure on greenfield land for development, especially in areas where demand for housing is high. The Council therefore seeks to allocate brownfield sites as a redevelopment priority. The Main Issues Report identifies regeneration opportunities across the Borders which are suitable for a variety of uses including housing and employment.</p> <p>It should also be noted that whilst the site is currently in agricultural use, the land is not identified as Prime Quality Agricultural Land. It is considered that the identification of some greenfield / agricultural land is inevitable.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are</p>	<p>It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH001 at this location.</p>

			<p>unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH1001, Land at Eshiels I,	<p><u>Woodland:</u></p> <p>The contributor has identified ancient semi natural</p>	<p>Comments noted.</p> <p>However, it should be noted that the wooded area to the north-eastern</p>	<p>It is recommended that the Council agree not to</p>

	<p>Eshiels</p>	<p>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. <b>(199)</b></p> <p>They would also be able to support the requirement to protect and enhance boundary features, if the wording 'where possible' was removed. <b>(199)</b></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. <b>(199)</b></p>	<p>boundary of the site is not an Ancient Woodland. In addition, while the area referred to by the contributor is only slightly within the site boundary (as evident on the "Scotland's Environment" website), it is not considered that removal of all or even part of this woodland would be required in the development of site MESH1001.</p> <p>It should also be noted that the Main Issues Report sets out a number of site requirements that include a requirement for a Masterplan in advance of taking site MESH1001 forward for development. That document would be subject to public consultation and would also include greater detail as to the potential development of the site.</p> <p>In respect to the site requirement to protect and enhance boundary features, it is not considered appropriate to remove the wording "<i>where possible</i>". As it would be inevitable that some boundary features may require removal to gain vehicular/pedestrian access into the site.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are</p>	<p>allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p> <p>In respect to site BESH1001 it is noted that the following site requirements are recommended in relation to landscaping for inclusion within the Proposed Local Development Plan:</p> <ul style="list-style-type: none"> <li>• "Protect and enhance the existing boundary features, where possible. Buffer areas for new and existing landscaping will be required</li> <li>• Planting, landscaping and shelterbelt required, to provide mitigation from</li> </ul>
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			<p>unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	<p>the impacts of development from sensitive receptors and to help integrate the site into the wider setting</p> <ul style="list-style-type: none"> <li>• The long term maintenance of landscaped areas must be addressed”.</li> </ul>
Eshiels	MESH1001, Land at Eshiels I,	<u>Disproportionate/alternative locations for development:</u>	It should be noted that it is not intended that all of the sites identified within the Main Issues	It is recommended that the Council agree not to

	Eshiels	<p>The contributor states that the scale of the proposed mixed use site is disproportionate to the developments proposed elsewhere in the Borders. <b>(201)</b></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. <b>(241)</b></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. <b>(239)</b></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. <b>(207)</b></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. <b>(216)</b></p> <p>The contributor states that the proposal is disproportionate to the overall requirement (3,841). <b>(197)</b></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. <b>(179)</b></p>	<p>Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that "<i>it is not anticipated the LDP2 will require a significant number of new housing sites</i>". The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>In addition, it should be noted that the Council are also required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas.</p> <p>Scottish Planning Policy requires LDP's to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>This site was identified through an independent study that was carried out by consultants to identify site options within the vicinity of Peebles. The study findings have</p>	<p>allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>
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		<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. <b>(185)</b></p>	<p>informed the potential site options set out in the Main Issues Report (MIR).</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership)</p>	
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			<p>funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESHI001, Land at Eshiels I, 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. <b>(202)</b></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. <b>(269)</b></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. <b>(207)</b></p>	<p>It is not intended to allocate all of the sites identified within the Main Issues Report within the Proposed Local Development Plan.</p> <p>It should be noted that the LDP process is advised by the Council's Economic Development section as to the requirement for additional land for Business and Industrial use. In addition, it should be noted that the Council through the Economic Development section and the Development Management section, receives regular enquiries from businesses to locate within the Western Strategic Development Area. Furthermore, the Council undertakes an Employment Land Audit annually to monitor the take up and availability of business and industrial land across the Borders.</p> <p>It should also be noted, that the Council have not received any acceptable alternative locations for Mixed Use/ Business and Industrial sites within the Western Strategic Development Area for inclusion in the LDP2 as part of the call for sites or through the Main Issues Report</p>	<p>It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>

			<p>public consultation process.</p> <p>In addition, it is not anticipated that any of the mixed use sites identified within the Main Issues Report would have a negative impact on the Peebles High street.</p> <p>It should be noted that as at March 2018, there were 343,535 Small and Medium-sized Enterprises (SMEs) operating in Scotland, providing an estimated 1.2 million jobs. SMEs accounted for 99.3% of all private sector enterprises, accounting for 54.9% of private sector employment and 41.5% of private sector turnover. (Scottish Government Website <a href="https://www2.gov.scot/Topics/Statistics/Browse/Business/Corporate/KeyFacts">https://www2.gov.scot/Topics/Statistics/Browse/Business/Corporate/KeyFacts</a>). This therefore, illustrates the importance that SME's make to the economy.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible</p>	
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			<p>due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH1001, Land at Eshiels I, Eshiels	<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. <b>(202)</b></p> <p>The contributor raises concerns regarding the impact upon the amenity, including views, noise</p>	<p>In the event of that any planning application was submitted on site MESH1001, Policy HD3 Protection of Residential Amenity would be taken into account in its consideration.</p> <p>The Council is aware of the sensitive location and designations and notes within the site</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site -</p>

		<p>and lighting as a result of the development. <b>(249)</b></p> <p>The contributor states that the volume proposed in Eshiels would be overbearing on the current properties. <b>(276)</b></p> <p>The contributor raises concerns in respect of the destruction of the visual amenity. <b>(209)</b></p>	<p>requirements for site MESH1001 in the Main Issues Report (MIR) that landscaping and screening would need to be carefully considered together with the site layout and design during the planning process to minimise any detrimental impacts on the landscape and views.</p> <p>In addition, it is noted that the MIR set out a number of other site requirements that included a requirement for a Masterplan in advance of taking the site forward for development.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land</p>	<p>BESH1001 at this location.</p>
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			<p>for employment use, it is recommended that a reduced site at this location for employment only – site BESH001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH001, Land at Eshiels I, 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. <b>(276)</b></p> <p>Contributor raises concerns regarding the drainage from the site. <b>(269, 293)</b></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. <b>(252)</b></p>	<p>As part of the site assessment process for the site, SEPA were consulted and stated that they required a Flood Risk Assessment to be undertaken to assess 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. In addition, due to the steepness of the adjacent hill slopes, SEPA also recommended 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. It is noted that SEPA did not object to the potential</p>	<p>It is recommended that the Council agree not to allocate site MESH001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH001 at this location.</p>



			<p>inclusion of the site within the Plan.</p> <p>In respect to Sewage facilities, whilst access to sewage facilities may currently be an issue, upgrades can overcome that issue.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice</p>	
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			for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.	
Eshiels	MESHI001, Land at Eshiels I, Eshiels	<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. <b>(292)</b></p>	<p>It should be noted that site MESHI001 was identified as a Mixed Use site and not a Housing site. Furthermore the site requirements set out in the Main Issues Report stated that a Masterplan would be required in taking the site forward. The Masterplan would seek to address the concern raised by the contributor in relation to siting industrial buildings adjacent to residential use.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the</p>	It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH001 at this location.

			<p>Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH1001, Land at Eshiels I, Eshiels	<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. <b>(300)</b></p>	<p>Whilst Eshiels may not have a pub or a shop, it has good access to employment and services, and there is the potential access to public transport to be improved on as Eshiels is located just off the A72. In addition, Eshiels is also located in close proximity to the Walkerburn to Peebles multi use path. It is also noted that a public footpath runs along the A72 into Peebles, although it is noted that this is on</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>

			<p>the southern side of the road. A site requirement also sets out a requirement for options for improvements to the existing public transport infrastructure will need to be explored, as well as the suitability of pedestrian provision on the A72.</p> <p>In addition, it should be noted that the Council are also required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas.</p> <p>Scottish Planning Policy requires Local Development Plans to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>Site MESH1001 was identified through an independent study that 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 Main Issues Report (MIR).</p>	
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			<p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily</p>	
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			developed substantial perimeter planting will be required to be carried out at an early stage.	
Eshiels	MESHI001, Land at Eshiels I, Eshiels	<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 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. <b>(269)</b></p>	<p>It is not considered that the majority of the new residents on site MESHI001 would be commuters to Edinburgh. It should be noted that the 2001 Census, Travel to Work Data found that only 20% of Peebles resident employed adults worked in Edinburgh. In addition, it is considered that Eshiels has good access to services and facilities at Peebles, including close proximity to the Walkerburn to Peebles multi use path. It is therefore considered that it would be likely that any potential development at this location would benefit Peebles High street.</p> <p>In addition, it should be noted that the Council are also required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas.</p> <p>Scottish Planning Policy requires Local Development Plans to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this</p>	It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH001 at this location.

			<p>requirement would result in a failure to provide a plan-led system.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist</p>	
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			in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.	
Eshiels	MESH1001, Land at Eshiels I, Eshiels	<p><u>Proposed use for the site:</u></p> <p>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. <b>(267)</b></p>	<p>Following assessment of the site MESH1001, it was considered that the area could be suitable for commercial mixed use development given its location close to Peebles, and the A72.</p> <p>It is noted that promoting mixed use sites is in line with national policy and gives an opportunity to create more sustainable areas with residential and non-retail employment activities.</p> <p>In addition it is noted that the Main Issues Report did not set out the exact use for employment and mixed use sites to give the market the flexibility to satisfy demand in different sectors.</p> <p>It should be noted, that a part of the Longer Term Mixed Use site within Peebles, site SPEEB005 has been identified as having potential to come forward in the short term to accommodate business and industrial use; however, the Economic Development Section of the Council are of the view that additional land for business and industrial use needs to be identified</p>	It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.



			<p>through the Local Development Plan process.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist</p>	
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			in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.	
Eshiels	MESHI001, Land at Eshiels I, Eshiels	<p><u>Pressure from developers:</u></p> <p>The contributor states that the impression they get, is that the developers are pushing for more housing in the Peebles area. <b>(257)</b></p>	<p>Historically Peebles has a vibrant market for housing development and the development industry will continue to seek further land in this area to meet demand.</p> <p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that "<i>it is not anticipated the LDP [Local Development Plan] 2 will require a significant number of new housing sites</i>". The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>In addition, it should be noted that the Council are also required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas. Scottish Planning Policy requires LDP's to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic</p>	It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESHI001 at this location.

			<p>development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase</p>	
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			<p>order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESHI001, Land at Eshiels I, Eshiels	<p><u>Does not align with overall aims of strategy:</u></p> <p>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. <b>(252)</b></p>	<p>It should be noted that site MESHI001 currently does not take the form of a woodland area. It is noted that there are a number of boundary trees on site, however, the site requirements contained within the Main Issues Report (MIR) sought to protect and enhance the existing boundary features.</p> <p>The SESPlan requires strategic growth in the Scottish Borders to be directed to three Strategic Development Areas (SDA) in the Central Borders, the Western Borders and the Eastern Borders.</p> <p>It should also be noted that Scottish Planning Policy requires Local Development Plans to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum</p>	<p>It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH001 at this location.</p>

			<p>of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of</p>	
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			Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.	
Eshiels	MESH1001, Land at Eshiels I, Eshiels	<u>Broadband infrastructure:</u>  The contributor raises concerns regarding the lack of suitable broadband infrastructure. <b>(239)</b>	The Scottish Borders has benefited from the Digital Scotland Superfast Broadband rollout which was programmed to connect 94.9% of premises to Fibre to the Cabinet Broadband by the end of 2018 (this includes the additional 'Gainshare' funding). The remaining gap in provision which comprises remoter rural areas and premises which suffer from 'long lines' will be addressed by the Scottish Government's R100 programme. It is critical that the region also maximises the provision of Full Fibre Connectivity to Businesses and the wider community. Mobile phone coverage is an important complement to the rollout of Superfast Broadband. Ongoing investments by Mobile Network Operators will result in significant improvements across the Scottish Borders. Efforts are being made to ensure that this coverage will be as comprehensive as possible and that the region will benefit from 5G coverage in the future.	No further action required.
Eshiels	MESH1001, Land at	<u>Existing use on the site:</u>	It should be noted that the Forestry Commission are a statutory	It is recommended that the Council

	Eshiels I, Eshiels	<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 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. <b>(239)</b></p>	<p>consultee in the Development Plan process and will continue to be involved.</p> <p>In respect to comments regarding to potential impacts on tourism and on Glentress; it should be noted that VisitScotland and the Forestry Commission have been consulted regarding the potential allocation of this site within the Local Development Plan and neither have objected to its potential allocation.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at</p>	<p>agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>
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			<p>this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESH1001, Land at Eshiels I, Eshiels	<p><u>Local economy:</u></p> <p>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. <b>(216)</b></p>	<p>It should also be noted that LDP policy ED7 Business, Tourism and Leisure Development in the Countryside aims to allow for appropriate employment generating development in the countryside whilst protecting the environment and to ensure that business, tourism and leisure related developments are appropriate to their location. It is not considered that any of the potential sites identified within the Main Issues Report is contrary to this policy.</p> <p>In addition, it should be noted that the 2001 Census, Travel to Work Data found that only 20% of Peebles resident employed adults worked in Edinburgh and of these 92% were car drivers or</p>	<p>It is recommended that the Council agree not to allocate site MESH1001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>



			<p>passengers, 6% used the bus and 2% used other transport means (including motorbikes).</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership)</p>	
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			<p>funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESHI001, Land at Eshiels I, Eshiels	<p><u>Housing tenure:</u></p> <p>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. <b>(235)</b></p>	<p>It should be noted that Scottish Planning Policy (SPP) and the Strategic Development Plan (SDP) include an affordable housing benchmark figure of 25%. The benchmark was given detailed consideration as part of the Affordable Housing SPG and this confirmed a need for 25%.</p> <p>The SDP requires strategic growth in the Scottish Borders to be directed to three Strategic Development Areas (SDA) in the Central Borders, the Western Borders and the Eastern Borders.</p> <p>It should also be noted that SPP requires Local Development Plans to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p>	<p>It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>

			<p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter</p>	
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			planting will be required to be carried out at an early stage.	
Eshiels	MESHI001, Land at Eshiels I, Eshiels	<p><u>Light pollution:</u></p> <p>The contributor raises concerns regarding the introduction of light pollution for the first time, to the hamlet. <b>(197)</b></p>	<p>In relation to comments regarding light pollution, this is a detailed issue that would be considered at planning application stage.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESHI001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice</p>	It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.

			for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.	
Eshiels	MESHI001, Land at Eshiels I, Eshiels	<p><u>Contrary to MIR statement:</u></p> <p>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. <b>(197)</b></p>	<p>It is acknowledged that paragraph 5.8 of the Main Issues Report (MIR) states: <i>“The Scottish Borders is an attractive area to live and work in and the Council continues to receive many applications for housing in the countryside. Whilst supporting such proposals which can help economic growth and local village services, this must be weighed up against matters such as the protection of the Scottish Borders countryside and sustainable travel principles. The Scottish Borders has outstanding scenic qualities within its landscape and planning policy seeks to protect it”</i>.</p> <p>However, Scottish Planning Policy (SPP) requires Local Development Plans to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum</p>	It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.

			<p>of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system. In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site</p>	
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			<p>MESHI001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
Eshiels	MESHI001, Land at Eshiels I, Eshiels	<p><u>Settlement boundary:</u></p> <p>The contributor states could/should Eshiels seek to be a settlement boundary especially if the plan goes ahead? <b>(276)</b></p>	<p>Comments noted.</p> <p>It should be noted that had either site MESHI001 or MESHI002 been allocated within the Proposed Local Development Plan (LDP) 2, then a new Development Boundary would have been drawn around Eshiels thereby giving Eshiels settlement status within the LDP.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation,</p>	<p>It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p>

			<p>including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESH1001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
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			<p>Furthermore, given that it is recommended that only an employment allocation is proposed at Eshiels, it is not recommended that a new Development Boundary is drawn to form a formal settlement at this location. It is noted that a similar approach has already been taken elsewhere within the LDP at St Boswells for Charlesfield.</p>	
Eshiels	MESHI001, Land at Eshiels I, Eshiels	<p>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.</p>	<p>Comments noted. Co-location issues, if necessary would issues investigated as part of any planning application.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions of the Scheduled Monument on site MESHI001, it is now not intended to allocate the site within the Proposed Local Development Plan (LDP).</p> <p>Nevertheless, taking into account the immediate need to identify land for employment use, it is</p>	<p>It is recommended that the Council agree not to allocate site MESHI001 within the Proposed Local Development Plan, but instead allocate a much reduced employment site - BESH1001 at this location.</p> <p>Include the following site requirement within the Proposed Local Development Plan for site BESH1001: <i>"It appears that there may be a culverted watercourse at the southern end of the site, therefore a feasibility study will be required to</i></p>

		<p>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.</p> <p>It appears that there may be a culverted watercourse at the southern end of the site. It is</p>	<p>recommended that a reduced site at this location for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p> <p>As a result of a reduced site now recommended at this location, many of the site requirements set out for MESH1001 are still relevant for site BESH1001.</p> <p>It is noted that the Main Issues Report already noted the site requirement for site MESH1001 regarding the need for a maintenance buffer strip of at least 6 metres wide is provided between the watercourse and built development and that additional water quality buffer strips may be required.</p> <p>Comment noted. It is proposed that a new site</p>	<p><i>investigate the potential for channel restoration</i>".</p> <p>In addition it is also proposed in relation to flood risk to include reference to the River Tweed: "... <i>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 risk</i>".</p>
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		<p>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 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 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. <b>(119)</b></p>	<p>requirement is included within the Proposed Local Development Plan regarding the need for a feasibility study.</p> <p>Comments noted. It is proposed that the first site requirement is amended to include, that the River Tweed may also require consideration.</p> <p>Comment noted.</p> <p>Comments noted. It is noted that reference to foul water disposal will be made within Volume 2 of the Proposed Local Development Plan.</p> <p>These issues would be addressed at planning application stage.</p>	
Eshiels	MESH1002, Land at	<u>General:</u>	The SESPlan requires strategic growth in the Scottish Borders to be	It is recommended that the Council

	<p>Eshiels II, Eshiels</p>	<p>The contributor objects to the inclusion of (MESH1002) within the MIR. <b>(189)</b></p> <p>The contributor states that the population density of the Eshiels development alone has 30% households per hectare. <b>(276)</b></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. <b>(20)</b></p> <p>The contributor highlights that the supporting document makes reference to a sawmill at Eshiels, which has not existed for over 20 years. <b>(150)</b></p> <p>There are inconsistencies between the proposals and existing SBC policies. <b>(166)</b></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. <b>(188)</b></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. <b>(201)</b></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. <b>(249)</b></p> <p>The contributor states that the suggestion of a</p>	<p>directed to three Strategic Development Areas (SDA), in the Central Borders, the Western Borders and the Eastern Borders.</p> <p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that “<i>it is not anticipated the LDP2 will require a significant number of new housing sites</i>”. The purpose of the MIR was to identify a number of site options and present those to the public so that the Local Development Plan (LDP) 2 could then be informed by their responses.</p> <p>It should also be noted that Scottish Planning Policy requires LDP’s to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>This site was identified through an independent study that was carried</p>	<p>agree not to allocate this site within the Proposed Local Development Plan.</p>
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		<p>mixed use conurbation in Eshiels is absurd. <b>(276)</b></p>	<p>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 Main Issues Report (MIR). It should be noted that the site was identified as a Mixed Use site and the Main Issues Report set out a number of site requirements including that a Masterplan would be required in taking the site forward.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>It should be noted that whilst the site is currently in agricultural use, the land is not identified as Prime Quality Agricultural Land. The identification of some greenfield / agricultural land is however</p>	
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			<p>inevitable.</p> <p>In relation to the comment regarding to reference to a sawmill at Eshiels, it should be noted that this is an Ordinance Survey issue and is outwith the control of the Council. Updates on the Ordinance Survey base maps will be undertaken in due course.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify</p>	
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			site MESH1002 within the Proposed LDP.	
Eshiels	MESH1002, 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 <b>(91)</b></p>	<p>Whilst access to sewage facilities may currently be an issue, upgrades can overcome that issue.</p> <p>A site is effective under the terms of the Planning Advice Note (PAN) 2/2010 if it can be developed within the programme period. The Council undertakes an annual Housing Land Audit that monitors the effectiveness of housing land. This will continue to be used to assess the appropriate allocations in the plan.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

			<p>Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, 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. <b>(108)</b></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. <b>(141)</b></p>	<p>The 2001 Census, Travel to Work Data found that 20% of Peebles resident employed adults worked in Edinburgh and of these 92% were car drivers or passengers, 6% used the bus and 2% used other transport means (including motorbikes).</p> <p>It should also be noted that the Council are required to identify a generous supply of land to meet identified housing need (including affordable housing) across the Strategic Development Areas. Failure to meet this requirement may result in development sites coming forward through the Development Management process and/or the Planning Appeals process.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>



			<p>existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, 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. <b>(91)</b></p>	<p>It is noted that the site is within close proximity to Peebles, which is 2 miles to the west. However, the close proximity to Peebles, including the cycle path along the former railway line, provides access to a wider range of services, employment and public transport opportunities. Furthermore the Main Issues Report (MIR) notes that: <i>"Improvements to the road network and public transport must continue to be supported"</i>.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

			<p>landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Coalescence:</u></p> <p>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. <b>(91)</b></p>	<p>Comments noted.</p> <p>It is acknowledged that the Main Issues Report (MIR) identified two sites for potential mixed use development; however, it is not considered there would be evidence of coalescence.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

			<p>unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Surrounding views/key receptors/setting:</u></p> <p>The contributors object to the inclusion of (MESH1002), being regular visitors to the area, including some of the following concerns; impact upon the surrounding views, peace and tranquillity of the area. <b>(31, 33, 34, 37, 43, 64, 76, 83, 98, 140)</b></p> <p>The contributor raises concerns regarding the impact of the development upon the tranquillity of Peebles and the surrounding countryside. <b>(205)</b></p> <p>Contributor objects to the inclusion of the site. As</p>	<p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development.</p> <p>The MIR in paragraph 3.3 notes that <i>"it is not anticipated the LDP [Local Development Plan] 2 will require a significant number of new housing sites"</i>. The purpose of the MIR was to identify a number of site options and present those to the public so</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

	<p>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. <b>(97)</b></p> <p>Contributor states that the area between Eshiels and Cardrona is exceptionally beautiful. <b>(167)</b></p> <p>The contributor raises concerns that the views from the tourist cottage will change drastically and objects to the development. <b>(49,96)</b></p> <p>The development would result in the loss of existing views from many of the current houses in Eshiels. <b>(90)</b></p> <p>Contributor raises concerns regarding the impact upon the views/landscape/scenery. <b>(50, 52, 53, 149, 202, 239, 243, 320, 233)</b></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. <b>(91)</b></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. <b>(46)</b></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. <b>(198)</b></p>	<p>that LDP2 could then be informed by their responses. In addition, it should be noted that the Council are also required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas.</p> <p>Scottish Planning Policy requires LDP's to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such</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. <b>(249)</b></p> <p>The contributor states that the rural development plan talks of the importance of the open and sweeping scenic vistas. <b>(276)</b></p> <p>The contributor states that people enjoy the 'wilderness' experience and this must be valued. <b>(243)</b></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. <b>(227)</b></p> <p>Contributor raises concerns regarding the visual impact of the development. <b>(197)</b></p>	<p>as archaeology, biodiversity, flood risk and landscape.</p> <p>In respect to comments regarding potential impacts on tourism and on Glentress; it should be noted that VisitScotland and the Forestry Commission have been consulted regarding the potential allocation of this site within the Local Development Plan; neither have objected to its potential allocation.</p> <p>With regards to comments relating to landscape and that the site is located within the Tweed Valley Special Landscape Area, it should be noted that neither Scottish Natural Heritage or the Council's Landscape Section objected to the potential inclusion of the site within the Local Development Plan.</p> <p>It should be noted that loss of a view is not a material consideration in Planning.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has</p>	
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			<p>now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<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. <b>(46, 69)</b></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. <b>(300)</b></p> <p>The contributor states that the development would have a negative impact upon the Tweed Valley. <b>(188)</b></p> <p>The contributor highlights that Eshiels is not an</p>	<p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development.</p> <p>The MIR in paragraph 3.3 notes that <i>"it is not anticipated the LDP [Local Development Plan] 2 will require a significant number of new housing sites"</i>. The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses. In addition, it should be noted that the Council are also required to allocate sufficient land within the Central, Eastern and</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

	<p>existing settlement within the LDP and that housing/industrial premises would swamp Eshiels. <b>(139)</b></p> <p>The contributor states that having a huge development at the entrance to Peebles will take away from the appeal of Peebles. <b>(186)</b></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. <b>(139)</b></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. <b>(51)</b></p> <p>The contributor states that the development would be out of scale/character for the area. <b>(90, 98, 140, 142, 150, 158, 166, 178, 179, 180, 185, 188, 186, 194, 198, 201, 241, 268, 269, 276, 298, 207)</b></p> <p>The contributor states that the development would severely detract from the current atmosphere and attractiveness of the area. <b>(149)</b></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.</p>	<p>Western Strategic Development Areas.</p> <p>Scottish Planning Policy requires LDP's to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>In respect to comments regarding to potential impacts on tourism and on</p>	
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		<p><b>(172)</b></p> <p>The site is out of character and contrary to Policy PMD4 and LDP2MIR para 3.6. <b>(172, 185, 186, 198, 207, 216)</b></p> <p>The contributor states that the site is out of proportion. <b>(216)</b></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. <b>(98)</b></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. <b>(52)</b></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</p>	<p>Glentress; it should be noted that VisitScotland and the Forestry Commission have been consulted regarding the potential allocation of this site within the Local Development Plan; neither have objected to its potential allocation.</p> <p>Furthermore, it should be noted that the Council's Roads Planning Section and Network Manager have been consulted. It is noted that neither of these consultees objected to the potential allocation of the site MESH1002.</p> <p>With regards to comments relating to landscape and that the site is located within the Tweed Valley Special Landscape Area, it should be noted that neither Scottish Natural Heritage or the Council's Landscape Section objected to the potential inclusion of the site within the Local Development Plan.</p> <p>In respect to comments that the site would be contrary to LDP Policy PMD4 Development Outwith Development Boundaries, it should be noted that should the site be allocated, the site and Eshiels would be included within a new Development Boundary.</p> <p>In respect to comments regarding amenity, it should be noted that</p>	
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		<p>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. <b>(91)</b></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. <b>(166)</b></p> <p>The contributor raised concerns regarding the impact upon the Special Landscape Area. <b>(172, 178, 179, 185, 186, 239, 207, 216)</b></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. <b>(155)</b></p> <p>The contributor states that the site is located within the heart of the Tweed Valley SLA where management recommendation include taking</p>	<p>Policy HD3 Protection of Residential Amenity would be relevant in the consideration of any planning application on the site.</p> <p>In addition, it is noted that the MIR sets out a number of site requirements that include a requirement for a Masterplan in advance of taking the site forward for development. As yet no layout for the site has been proposed.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p>	
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		<p>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. <b>(91)</b></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. <b>(91)</b></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. <b>(108)</b></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. <b>(139)</b></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</p>	<p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
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		<p>attractive ambience. <b>(154)</b></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. <b>(155)</b></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. <b>(166)</b></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. <b>(201)</b></p> <p>The contributor states that making Eshiels a much bigger satellite of Peebles will destroy the countryside feel of the Western Borders. <b>(223)</b></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. <b>(266)</b></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. <b>(292)</b></p> <p>The contributor states that the current approach to Glentress forest is in keeping with the surrounding</p>		
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		<p>countryside that attracts people to the area. Developing this area for housing will severely detract from its current atmosphere and attractiveness. <b>(292)</b></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. <b>(293)</b></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. <b>(298)</b></p> <p>The contributor considers that the proposed development would result in the area becoming urbanised. <b>(271)</b></p> <p>The contributor raises concerns at the loss of the countryside. <b>(268)</b></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. <b>(257)</b></p> <p>The contributor states that the proposed development seems at odds with the landscape/out of proportion. <b>(239, 243)</b></p> <p>The contributor states that the urbanisation would be most unwelcome in this rural economy. <b>(216)</b></p> <p>The contributor states that locating a big mixed</p>		
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		<p>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. <b>(217)</b></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. <b>(229)</b></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. <b>(233)</b></p> <p>The contributor raises concerns regarding the over development in the vicinity of Eshiels. <b>(206)</b></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. <b>(197)</b></p> <p>The contributor raises concerns regarding the number of units proposed, which would swamp the existing hamlet and cause logistical problems. <b>(197)</b></p> <p>The contributor raises concerns regarding the</p>		
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		<p>impact upon the special scenic area, impact upon the character of the area and visual damage to the landscape. <b>(197)</b></p> <p>Current policy EP5 helps to protect against inappropriate development in the Special Landscape Area. These proposals are inappropriate and should be rejected. <b>(318)</b></p> <p>The contributor does not consider that the siting of industrial buildings alongside housing is appropriate. <b>(149)</b></p>		
Eshiels	MESHI002, Land at Eshiels II, Eshiels	<p><u>Tourism:</u></p> <p>The contributor objects to the inclusion of (MESHI002) and the potential impact upon tourism. <b>(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)</b></p> <p>The contributor states that the area will become less attractive to walkers and cyclists. <b>(188)</b></p> <p>The contributor raises concerns that such a development will make Glentress less appealing if it is surrounded by housing and business estate. <b>(186)</b></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. <b>(76)</b></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. <b>(52, 69,</b></p>	<p>The success of outdoor recreational facilities at Glentress has helped tourism in the area and helps the status of Peebles as a recognised buoyant town centre. Peebles remains a very attractive area for prospective house builders partly due to its proximity to Edinburgh.</p> <p>The Main Issues Report (MIR) recognises that the built and natural heritage are major component parts of the attractiveness of the Scottish Borders which must be protected and enhanced. There are a large number of listed buildings, conservation areas, landscape and biodiversity designations and opportunities must continue to be explored to capitalise on these assets in the interests of tourism and economic development. It is acknowledged that the Plan must continue to ensure new development is located and</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

		<p><b>90, 139, 188)</b></p> <p>The contributor raises concerns that Glentress has an international reputation as a centre of excellence for mountain biking. <b>(139)</b></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. <b>(32)</b></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. <b>(51)</b></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 develop tourism at Glentress, in the town of Peebles and in the Tweed Valley generally. <b>(59)</b></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</p>	<p>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.</p> <p>It should be noted that Scottish Natural Heritage, VisitScotland and the Forestry Commission have all been consulted regarding the potential allocation of this site within the Local Development Plan. However, none objected to the potential allocation of this site.</p> <p>In addition, it is noted that the MIR sets out a number of site requirements that include a requirement for a Masterplan in advance of taking the site forward for development.</p> <p>It should also be noted that LDP policy ED7 Business, Tourism and Leisure Development in the Countryside aims to allow for appropriate employment generating development in the countryside whilst protecting the environment and to ensure that business, tourism and leisure related developments are appropriate to their location. It is not considered that any of the potential sites identified within the MIR are contrary to this policy.</p>	
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		<p>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. <b>(90)</b></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. <b>(108)</b></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. <b>(154)</b></p> <p>The contributor raises concerns that the development will remove a sense of countryside experience which will impact negatively on tourism. <b>(155)</b></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. <b>(166)</b></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. <b>(167)</b></p>	<p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
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		<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. <b>(185)</b></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. <b>(201)</b></p> <p>The contributor raises concerns regarding the impact of the development upon Glentress for biking. The development would take away the peacefulness. <b>(205)</b></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. <b>(246)</b></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. <b>(276)</b></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. <b>(292)</b></p> <p>The contributor raised concerns regarding the impact upon Glentress/Tweed Valley. <b>(257, 268, 269, 271, 300)</b></p>		
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		<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. <b>(239)</b></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. <b>(207)</b></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. <b>(216)</b></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. <b>(216)</b></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. <b>(30)</b></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. <b>(206)</b></p> <p>Glentress Forest is one of the principal tourist attractions in this part of the Borders and has</p>		
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		<p>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. <b>(318)</b></p>		
Eshiels	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. <b>(24)</b></p>	<p>This site was identified through an independent study that 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 Main Issues Report (MIR).</p> <p>It should be noted that deliverability of the potential sites was considered, in terms of access and infrastructure constraints. Developer interests were contacted at two points in the study: initially to gather an understanding of the types of sites likely to be of interest; and later to consider viability of the potential development sites.</p> <p>It is therefore not considered that there are issues relating to land economics that would prevent the site from coming forward.</p> <p>However, in light of the consultation</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>

			<p>responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Traffic concerns:</u></p> <p>The contributor raises concerns regarding the impact upon traffic and the A72/surrounding road networks/parking/potential for accidents. <b>(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)</b></p>	<p>It should be noted that it is not intended to allocate all of the sites identified within the Main Issues Report within the Proposed Local Development Plan.</p> <p>Whilst the primary responsibility for operating the development planning system for the Scottish Borders lies with the Council, Circular 6/2013</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

		<p>Concerns that the development will create a lot of extra traffic as people will inevitable drive to Peebles for various services. <b>(46)</b></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. <b>(202)</b></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. <b>(271)</b></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. <b>(235)</b></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. <b>(318)</b></p>	<p>Development Planning states that all interests should be engaged as early and as fully as possible. In addition that document also states “<i>key agencies are under a specific duty to co-operate in the preparation of development plans</i>”; this includes Scottish Natural Heritage, Scottish Environmental Protection Agency, Scottish Water and NHS (Health Board). The Council have consulted with all key agencies throughout the Local Development Plan process and will continue to do so. This then allows key agencies to plan according to their needs and demands also.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>Furthermore, it should be noted that</p>	
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			<p>the Council's Roads Planning Section and Network Manager have been consulted. It is noted that neither of these consultees objected to the potential allocation of the site MESH1002.</p> <p>In respect to comments regarding school transport, it should be noted that transport is provided to pupils who live over 2 miles from their catchment school in primary and to those who live over 3 miles away from their catchment school in secondary.</p> <p>It should be noted that the site was identified as a Mixed Use site with housing. Furthermore the site requirements set out in the Main Issues Report stated that a Masterplan would be required in taking the site forward. .</p> <p>In addition, it is not anticipated any of the mixed use sites to be identified in the Proposed Plan will have a negative impact on Peebles.</p> <p>Whilst Eshiels may not have a pub or a shop, it has good access to employment and services, and there is the potential access to public transport to be improved on as Eshiels is located just off the A72. In addition, Eshiels is also located in close proximity to the Walkerburn to</p>	
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			<p>Peebles multi use path. It is also noted that a public footpath runs along the A72 into Peebles, although it is noted that this is on the southern side of the road. A site requirement also sets out a requirement for options for improvements to the existing public transport infrastructure will need to be explored, as well as the suitability of pedestrian provision on the A72.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p>	
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			As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.	
Eshiels	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. <b>(20)</b></p>	<p>In relation to comments regarding noise and air quality, these are detailed issues that would be considered at planning application stage.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.



Eshiels	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. <b>(20, 23, 69, 141, 145, 155, 166)</b></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. <b>(38)</b></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. <b>(46, 155, 172, 186, 198, 205, 207, 216, 239)</b></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). <b>(53, 59, 83, 90, 139, 149, 179, 180, 194, 197, 201, 205, 252, 257, 292, 300, 209, 217, 229, 235)</b></p> <p>The contributor states that there would need to be local infrastructure improvements if the</p>	<p>LDP.</p> <p>It should be noted that it is not intended to allocate all of the sites identified within the Main Issues Report within the Proposed Local Development Plan.</p> <p>Whilst the primary responsibility for operating the development planning system for the Scottish Borders lies with the Council, Circular 6/2013 Development Planning states that all interests should be engaged as early and as fully as possible. In addition that document also states “<i>key agencies are under a specific duty to co-operate in the preparation of development plans</i>”; this includes Scottish Natural Heritage, Scottish Environmental Protection Agency, Scottish Water and NHS (Health Board). The Council have consulted with all key agencies throughout the Local Development Plan process and will continue to do so. This then allows key agencies to plan according to their needs and demands also.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>
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		<p>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. <b>(155)</b></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. <b>(91)</b></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</p>	<p>assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>NHS Borders have stated that they will continue to engage with SBC colleagues to provide primary care and public health input to the wider planning process including the creation of the next Scottish Borders Council Local Development Plan early in its preparation cycle as part of a Health in All Policies approach.</p> <p>It should be noted that Scottish Water were consulted as part of the site assessment process undertaken for the site. In addition, whilst access to sewage facilities may currently be an issue, upgrades can overcome that issue.</p> <p>Furthermore, it should be noted that the Council's Education, Archaeology, and Roads Planning sections, as well as Historic Environment Scotland and Scottish Natural Heritage have been consulted. It is noted that none of these consultees objected to the potential allocation of the site</p>	
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		<p>a school bus pass. <b>(91)</b></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. <b>(108)</b></p> <p>Concerns are raised that future road expansion will take place along the old railway tracks, which are currently used for walking/cycling. <b>(108)</b></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. <b>(139)</b></p> <p>The contributor raises concerns regarding the lack of a safe footpath between Eshiels and Peebles. <b>(239)</b></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. <b>(185)</b></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. <b>(185)</b></p> <p>Haylodge Health Centre is becoming more and</p>	<p>MESHI002.</p> <p>In respect to comments regarding school transport, it should be noted that transport is provided to pupils who live over 2 miles from their catchment school in primary and to those who live over 3 miles away from their catchment school in secondary.</p> <p>It should be noted that the site was identified as a Mixed Use site with housing. Furthermore the site requirements set out in the Main Issues Report stated that a Masterplan would be required in taking the site forward. .</p> <p>In addition, it is not anticipated that any of the mixed use sites to be identified in the Proposed Plan will have a negative impact on the economy of Peebles.</p> <p>Whilst Eshiels may not have a pub or a shop, it has good access to employment and services, and there is the potential access to public transport to be improved on as Eshiels is located just off the A72. In addition, Eshiels is also located in close proximity to the Walkerburn to Peebles multi use path. It is also noted that a public footpath runs along the A72 into Peebles, although it is noted that this is on</p>	
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		<p>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. <b>(185)</b></p> <p>The contributor states that there is only 1 ambulance covering the area. <b>(185)</b></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. <b>(201)</b></p> <p>The contributor states that mixed use is not appropriate for the site, due to the narrow access roads. <b>(273)</b></p> <p>The contributor raised concerns that there is no school bus in Eshiels. <b>(269)</b></p> <p>The contributor states that commitment to extensive infrastructure improvements are required before any further significant development can take place. <b>(269)</b></p> <p>The contributor raises concerns regarding the car parking facilities within Peebles and that it cannot cope with the current population. <b>(252)</b></p> <p>The contributor questions the expansion in infrastructure required. They question how this proposal will link to Peebles, as it is well outside</p>	<p>the southern side of the road. A site requirement also sets out a requirement for options for improvements to the existing public transport infrastructure will need to be explored, as well as the suitability of pedestrian provision on the A72.</p> <p>The 2001 Census, Travel to Work Data found that only 20% of Peebles resident employed adults worked in Edinburgh and of these 92% were car drivers or passengers, 6% used the bus and 2% used other transport means (including motorbikes).</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that</p>	
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		<p>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. <b>(243)</b></p> <p>The proposal would encourage a large amount of school car traffic. <b>(241)</b></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. <b>(239)</b></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 (MESHI001). <b>(213)</b></p> <p>The contributor states that there is insufficient road and water infrastructure. <b>(235)</b></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. <b>(197)</b></p> <p>Contributor raises concerns regarding septic tank waste and whether the existing treatment plant can cope with this amount of houses. <b>(197)</b></p> <p>The contributor states that Eshiels has no</p>	<p>there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESHI002 within the Proposed LDP.</p>	
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		amenities and residents will go into Peebles and head to Edinburgh. <b>(197)</b>		
Eshiels	MESHI002, 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. <b>(23, 139, 149, 150, 155, 172, 178, 179, 185, 186, 197, 198, 205, 241, 269, 276, 292, 207, 216, 229)</b></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. <b>(180)</b></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. <b>(205)</b></p>	<p>It should be noted that it is not intended to allocate all of the sites identified within the Main Issues Report within the Proposed Local Development Plan.</p> <p>In the consideration of any site for inclusion in the Main Issues Report, a full site assessment was carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, and Scottish Natural Heritage) are incorporated into that assessment. This rigorous site assessment process then allows identification of the best sites possible.</p> <p>It is not considered that development at this location will result in ribbon development or coalescence of the settlements within the Tweed Valley.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

			<p>existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Health &amp; well-being/amenity of existing residents:</u></p> <p>The contributor states that the development of (MESH1002) would impact upon the health and well-being of the existing residents. <b>(43)</b></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. <b>(90,95)</b></p>	<p>It should be noted that the site is located within the Strategic Green Network as set out in Local Development Plan policy EP12 Green Networks. The aim of Green Networks are to assist in supporting sustainable economic growth, tourism, recreation, the creation of an environment that promotes a healthier-living lifestyle, and the protection and enhancement of biodiversity, and have the potential to improve water quality, promote flood protection and reduce pollution.</p> <p>It is therefore not considered that development at this location would</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

			<p>have a negative impact on the health and wellbeing of existing residents.</p> <p>In relation to comments regarding noise, light and dust pollution, these would be issues that would be considered at planning application stage.</p> <p>In respect to comments regarding amenity, it should be noted that Policy HD3 Protection of Residential Amenity would be relevant in the consideration of any planning application on the site.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate</p>	
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			<p>sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Dark skies lost:</u></p> <p>The contributor states the development will result in the loss of Peebles dark sky. <b>(51, 69, 90, 276)</b></p> <p>The contributors raise concerns regarding the impact of the development upon the Eshiels dark sky environment. <b>(139, 149, 155, 186, 197, 292)</b></p>	<p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that <i>“it is not anticipated the LDP2 will require a significant number of new housing sites”</i>. The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>However the Council are aware that the lighting of roads, footpaths, domestic and commercial property should be an integral element of all development proposals at the outset and not, as has sometimes been the case in the past, addressed as an afterthought. Furthermore it is possible to reduce many of the negative effects of lighting through careful design and planning, using lighting only where and when necessary, using an appropriate strength of light and adjusting light</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

			<p>fittings to direct the light to where it is required. It is acknowledged that illumination should be appropriate to the surroundings and character of the area as a whole.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II,	<p><u>Loss of agricultural land:</u></p> <p>The contributor states that a great deal of</p>	It should be noted that it is not intended that all of the sites identified within the Main Issues	It is recommended that the Council agree not to

	Eshiels	<p>agricultural land will be lost along with the rural jobs associated with the land. <b>(69)</b></p> <p>The contributor states that the development would cause the destruction of ancient pastures. <b>(108)</b></p> <p>The contributor states that the development would result in the loss of prime quality agricultural land. <b>(30, 149, 166, 205 292)</b></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. <b>(155)</b></p> <p>The site will result in the removal of agricultural land counter to Policy ED10. <b>(172, 185, 186, 198, 207, 216)</b></p> <p>Contributor raises concerns regarding the loss of green belts and agricultural land. <b>(241)</b></p>	<p>Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that “<i>it is not anticipated the LDP2 will require a significant number of new housing sites</i>”. The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified.</p> <p>It should be noted that whilst the site is currently in agricultural use for grazing, the land is not identified as Prime Quality Agricultural Land. The identification of some greenfield / agricultural land is inevitable.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for</p>	allocate this site within the Proposed Local Development Plan.
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			<p>development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, 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. <b>(69, 186)</b></p> <p>The contributor fears this small rural community may be permanently scarred by this proposal. <b>(201)</b></p>	<p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that "<i>it is not anticipated the LDP2 will require a significant number of new housing sites</i>". The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>

			<p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, 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. <b>(88)</b></p>	<p>It should be noted that the Scottish Environment Protection Agency (SEPA) were consulted as part of the site assessment process and as a result the following site requirement was included in the Main Issues Report for the site: "A <i>maintenance buffer strip of at least 6 metres must be provided between</i></p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>

			<p><i>the watercourse and any built development. Additional water quality buffer strips may also be required</i>’.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland’s restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Indicative site capacity:</u></p> <p>The contributor states that the indicative site capacity for this site and (MESH1001) is greater</p>	It is not intended to allocate all of the sites identified within the Main Issues Report within the Proposed Local Development Plan.	It is recommended that the Council agree not to allocate this site

		<p>than the 'preferred sites' for the whole of the rest of the Borders. <b>(90)</b></p>	<p>The SESPlan requires strategic growth in the Scottish Borders to be directed to three Strategic Development Areas (SDA) in the Central Borders, the Western Borders and the Eastern Borders.</p> <p>It should also be noted that Scottish Planning Policy requires Local Development Plans to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system. In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape. In doing this</p>	<p>within the Proposed Local Development Plan.</p>
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			<p>rigorous site assessment process, the best sites possible are identified.</p> <p>It should be noted that a Development Options Study was undertaken to identify and assess options for housing and employment land in the Western Strategic Development Area, centred on the central Tweeddale area. This was due to a number of physical and infrastructure constraints within the central Tweeddale area. The study identified a number of potential short and long term housing options as well as sites for business/industrial use. Site MESH1002 was one of the sites identified in that study.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for</p>	
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			<p>mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Flood risk:</u></p> <p>The contributor states that the development would increase flooding risk for the housing and fields below the road. <b>(90, 235)</b></p> <p>The contributor states that the development may lead to flooding of areas to the south of the A72. <b>(166)</b></p> <p>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. <b>(91)</b></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</p>	<p>It should be noted that Scottish Environment Protection Agency (SEPA) and the Council's Flood and Coastal Management Team were consulted as part of the site assessment process undertaken for the site.</p> <p>In addition, the Main Issues Report included a site requirement for a Flood Risk Assessment to assess the risk from the Linn Burn, Eshiels Burn and the small water course that flows adjacent to the site.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

		<p>swifter and this will exacerbate flooding. <b>(108)</b></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. <b>(139)</b></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. <b>(150)</b></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. <b>(155)</b></p> <p>The contributor raises concerns regarding flood risk as a result of development on this site/surrounding area/roads. <b>(172, 198, 205, 269)</b></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 wet weather, 26 hectares of tarmac'd land would need significant investment in drainage for the whole area. <b>(185)</b></p> <p>The contributor states that the areas at the bottom of the fields act as flood plains at the moment with</p>	<p>due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
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		<p>housing here the road and houses opposite will be subject to flooding. The road currently floods over the road when heavy rainfall. <b>(241)</b></p> <p>The contributor raises concerns regarding the potential for flooding from the hills into the fields. <b>(239)</b></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. <b>(207)</b></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. <b>(216)</b></p>		
Eshiels	MESHI002, Land at Eshiels II, 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. <b>(90, 139)</b></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. <b>(91)</b></p> <p>Contributor raises concerns regarding the problems of sewerage disposal/treatment from the site. <b>(172, 197, 198, 269, 293, 207, 216, 229, 235)</b></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</p>	<p>It should be noted that Scottish Water were consulted as part of the site assessment process undertaken for the site. In addition, whilst access to sewage facilities may currently be an issue, upgrades can overcome that issue.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>

		<p>these dwellings. <b>(185)</b></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. <b>(318)</b></p>	<p>upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, 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. <b>(90)</b></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. <b>(194)</b></p> <p>The contributor states that there is a tree preservation order to the west of the site boundary. <b>(91)</b></p> <p>The contributor states that there are archaeological/heritage constraints within part of the site. Installation/upgrading of infrastructure</p>	<p>It is should be noted that the Council's Ecology Officer and Heritage and Design Officer, as well as Scottish Natural Heritage (SNH) and Historic Environment Scotland (HES) were consulted as part of the site assessment process undertaken for the site. It is noted that none of the consultees objected to the potential allocation of the site MESH1002.</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>

		<p>may detrimentally impact upon these interests. <b>(91)</b></p> <p>The contributor states that development may cause damage to the historic sites, buildings and artefacts close to the access road. <b>(108)</b></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. <b>(108)</b></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. <b>(167)</b></p> <p>The contributor raises concerns in respect of the archaeological impact of the new infrastructure on the local scheduled monuments. <b>(239)</b></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</p>	<p>Comments noted.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment</p>	
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		emerge. <b>(164)</b>	<p>Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Greenhouse gas emissions:</u></p> <p>The contributor advises that the development would not reduce the need to travel or greenhouse gas emissions. <b>(90)</b></p>	<p>The SESPlan requires strategic growth in the Scottish Borders to be directed to three Strategic Development Areas (SDA) in the Central Borders, the Western Borders and the Eastern Borders.</p> <p>It should also be noted that Scottish Planning Policy requires Local Development Plans to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system. In the consideration of any site for</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

			<p>inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape. In doing this rigorous site assessment process, the best sites possible are identified.</p> <p>Whilst Eshiels may not have a pub or a shop, it has good access to employment and services, and there is the potential access to public transport to be improved on as Eshiels is located just off the A72. In addition, Eshiels is also located in close proximity to the Walkerburn to Peebles multi use path. It is also noted that a public footpath runs along the A72 into Peebles, although it is noted that this is on the southern side of the road. A site requirement also sets out a requirement for options for improvements to the existing public transport infrastructure will need to be explored, as well as the suitability of pedestrian provision on the A72.</p>	
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Eshiels	MESH1002, Land at Eshiels II, 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. <b>(91)</b></p> <p>The contributor states that the proposal would</p>	<p>It should be noted that the Council's Ecology Officer and Scottish Natural Heritage (SNH) were consulted as part of the site assessment process undertaken for the site. It is noted that neither the Ecology Officer nor SNH objected to the potential allocation of the site</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>



		<p>have a reduction of biodiversity counter to Policy EP3. <b>(172, 207)</b></p> <p>Contributors raise concerns including the following; impact upon local wildlife/ecology/biodiversity/TPO's <b>(108, 140, 167, 179, 185, 202, 239, 241, 216)</b></p> <p>The contributor raises concerns in respect of the environmental impact upon biodiversity. <b>(239)</b></p> <p>The contributor raises concerns regarding the environmental impact from the development. <b>(197)</b></p>	<p>MESHI002.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESHI002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESHI002 within the Proposed LDP.</p>	
Eshiels	MESHI002, Land at Eshiels II, 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. <b>(108)</b></p>	<p>It should be noted that the Main Issues Report included a site requirement for a Flood Risk Assessment to assess the risk from the Linn Burn, Eshiels Burn and the small water course that flows adjacent to the site.</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>

			<p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Landscape (SNH):</u></p> <p>The contributor states that this site shares many of the characteristics of (MESH1001), 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 (MESH1001).</p>	<p>Comments noted.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>

		<p>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.</p> <p>As with (MESH1001), the contributor strongly advises that if 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 (MESH1001), the design intention for neighbourhood functions, the urban form, the 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. <b>(213)</b></p>	<p>further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, 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. <b>(91)</b></p>	<p>Comments noted. However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

			<p>Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Core path:</u></p> <p>The contributor states that the proposed allocation to the west (MESH1002) has a core path running through it. <b>(91)</b></p>	<p>Comment noted.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>

			<p>Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Lack of vision for the site:</u></p> <p>The contributor states that there appears to be a conflict within the Council as to the most suitable use for the site (MESH1002). 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. <b>(91)</b></p>	<p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>In undertaking this process it should be noted that each consultee responds in relation to their area of interest/expertise. This can result in different views/opinions on a same site. However, it is the role of planning to ensure that all of these views are considered and weighed up in coming to any final decision. .</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

			<p>landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Suggested limitations on construction works:</u></p> <p>The contributor suggests that the following limitations are put on any construction work;</p> <ul style="list-style-type: none"> <li>- Sound barriers put in place between their property and the proposed construction works</li> <li>- Acceptable type and level of noise be decided upon, monitored and enforced by Environmental Health Officers on a regular basis</li> <li>- Environmental Health Officers to monitor the amount of light pollution on their property</li> </ul>	<p>Building works by their very nature, generate noise and additional traffic etc. Planning permissions sometimes include conditions intended to minimise impacts, both during the construction phase and afterwards, during the life of the development. However, issues such as those raised would be dealt with at planning application stage.</p> <p>However, in light of the consultation responses received during the Main</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

		<ul style="list-style-type: none"> <li>- Environmental Health officers to monitor the proposed construction site to ensure that the dust and smell levels</li> <li>- 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</li> <li>- 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. <b>(95)</b></li> </ul>	<p>Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Access to an existing property:</u></p> <p>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</p>	<p>In light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>

		is not restricted. <b>(95)</b>	<p>upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>De-value existing properties:</u></p> <p>The contributor states that the proposal will devalue existing properties. <b>(98)</b></p>	<p>It should be noted that this is not a material planning consideration.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.



			<p>Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Design:</u></p> <p>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.</p> <p><b>(98)</b></p>	<p>It should be noted that the Council has produced Supplementary Planning Guidance (SPG) on Placemaking and Design to encourage good design and sustainable development in the Borders. This SPG relates to all housing tenures including affordable housing.</p> <p>In addition, it is noted that the MIR sets out a number of site requirements that include a requirement for a Masterplan in advance of taking the site forward for development.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

			<p>existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Carbon foot print/sustainability:</u></p> <p>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. <b>(108)</b></p> <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. <b>(155)</b></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</p>	<p>It is not intended to allocate all of the sites identified within the Main Issues Report within the Proposed Local Development Plan.</p> <p>The SESPlan requires strategic growth in the Scottish Borders to be directed to three Strategic Development Areas (SDA) in the Central Borders, the Western Borders and the Eastern Borders.</p> <p>It should also be noted that Scottish Planning Policy requires Local Development Plans to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

		<p>by reducing car miles. <b>(172)</b></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. <b>(186)</b></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. <b>(198)</b></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. <b>(201)</b></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. <b>(292)</b></p> <p>The contributor states that residents will need to drive to work in Edinburgh, adding to the traffic congestion and pollution. <b>(252)</b></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. <b>(241)</b></p>	<p>requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system. In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape. In doing this rigorous site assessment process, the best sites possible are identified.</p> <p>In relation to the site assessment undertaken for the site, it should be noted that the Roads Planning Section have stated:  <i>"...Pedestrian/cycle links with the Glentress Centre will be required and the merits of vehicular connectivity can be considered as part of the Transport Assessment. ... Options for improvements to the existing public transport</i></p>	
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			<p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, 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</p>	<p>Comments noted.</p> <p>Whilst, brownfield land is the first consideration when identifying additional sites, as a result of limited land availability there is pressure on greenfield land for development, especially in areas where demand for housing is high. The Council</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

		<p>developer, but then it would be even more expensive to try to produce essential food from unsuitable land. <b>(108)</b></p>	<p>therefore seeks to allocate brownfield sites as a redevelopment priority. The MIR identifies regeneration opportunities across the Borders which are suitable for a variety of uses including housing and employment. Therefore the identification of current agricultural land is inevitable.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed</p>	
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			LDP.	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<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 developments proposed elsewhere in the Borders. <b>(201)</b></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. <b>(241)</b></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. <b>(239)</b></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. <b>(207)</b></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. <b>(216)</b></p> <p>The contributor states that the proposal is disproportionate to the overall requirement (3841). <b>(197)</b></p> <p>The main settlements are the areas which should</p>	<p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that "<i>it is not anticipated the LDP2 will require a significant number of new housing sites</i>". The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>In addition, it should be noted that the Council are also required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas.</p> <p>Scottish Planning Policy requires LDP's to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>However, in light of the consultation</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

		<p>be developed Borders wide, developing very small settlements such as Eshiels will cause undue pressure on an already heavily laden services system. <b>(179)</b></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. <b>(185)</b></p>	<p>responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, 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. <b>(202)</b></p> <p>The contributor states that they are unaware of</p>	<p>It should be noted that the LDP process is advised by the Council's Economic Development section as to the requirement for additional land for Business and Industrial use. In addition, it should be noted that the Council through the Economic Development section and the Development Management section, receives regular enquiries from</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>



		<p>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. <b>(269)</b></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. <b>(207)</b></p>	<p>businesses to locate within the Western Strategic Development Area. Furthermore, the Council undertakes an Employment Land Audit annually to monitor the take up and availability of business and industrial land across the Borders.</p> <p>It should also be noted, that the Council have not received any acceptable alternative locations for Mixed Use/ Business and Industrial sites within the Western Strategic Development Area for inclusion in the LDP2 as part of the call for sites or public consultation process.</p> <p>In addition, it is not anticipated that any of the mixed use sites to be identified in the Proposed Plan will have a negative impact on the Peebles High street.</p> <p>It should be noted that as at March 2018, there were 343,535 Small and Medium-sized Enterprises (SMEs) operating in Scotland, providing an estimated 1.2 million jobs. SMEs accounted for 99.3% of all private sector enterprises, accounting for 54.9% of private sector employment and 41.5% of private sector turnover. (Scottish Government Website <a href="https://www2.gov.scot/Topics/Statistics/Browse/Business/Corporate/KeyFacts">https://www2.gov.scot/Topics/Statistics/Browse/Business/Corporate/KeyFacts</a>). This therefore, illustrates the</p>	
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			<p>importance that SME's make to the economy.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<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 there because of its rural, scenic and</p>	<p>It should be noted that Policy HD3 Protection of Residential Amenity would be relevant. In relation to the issues raised, these would be dealt with at planning application stage.</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local</p>

		<p>offers space for leisure. <b>(202)</b></p> <p>The contributor raises concerns regarding the impact upon the amenity, including views, noise and lighting as a result of the development. <b>(249)</b></p> <p>The contributor states that the volume proposed in Eshiels would be overbearing on the current properties. <b>(276)</b></p> <p>The contributor raises concerns in respect of the destruction of the visual amenity. <b>(209)</b></p>	<p>The Council is aware of the sensitive location and designations. Landscaping and screening would need to be carefully considered together with the site layout and design during the planning application process to minimise any detrimental impacts on the landscape and views.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed</p>	<p>Development Plan.</p>
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Eshiels	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. <b>(276)</b></p> <p>Contributor raises concerns regarding the drainage from the site. <b>(269, 293)</b></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. <b>(252)</b></p>	<p>LDP.</p> <p>As part of the site assessment process for the site, SEPA were consulted and state that they require a Flood Risk Assessment to be undertaken to assess the risk from the Linn Burn, Eshiels Burn and small watercourses which flow through and adjacent to the site. In addition, due to the steepness of the adjacent hill slopes, SEPA also recommended 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. It is noted that SEPA did not object to the potential inclusion of the site within the Plan.</p> <p>In respect to sewage facilities, whilst access to sewage facilities may currently be an issue, upgrades can overcome that issue.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.
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			<p>upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, 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. <b>(205)</b></p>	<p>It should be noted that a Development Options Study was undertaken to identify and assess options for housing and employment land in the Western Strategic Development Area. This was due to a number of physical and infrastructure constraints within the central Tweeddale area. The study identified a number of potential short and long term housing options as well as sites for business/industrial use. Site MESH1002 was one of the sites identified in that study.</p> <p>Paragraph 40 of Scottish Planning Policy requires: "<i>spatial strategies within development plans to promote a sustainable pattern of development appropriate to the</i></p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

			<p><i>area. To do this decisions should be guided by the following policy principles: optimising the use of existing resource capacities, particularly by co-ordinating housing and business development with infrastructure investment including transport, education facilities...”.</i></p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland’s restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
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Eshiels	MESH1002, 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. <b>(283)</b></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 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. <b>(239)</b></p>	<p>It should be noted that the Forestry Commission are a statutory consultee in the Development Plan process and will continue to be involved. It is also noted that the Council did not receive any objection to the inclusion of site MESH1002 within the Main Issues Report (MIR) from the Forestry Commission.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.
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			site MESH1002 within the Proposed LDP.	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<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. <b>(292)</b></p>	<p>It should be noted that the site was identified as a Mixed Use site and not a Housing site. Furthermore the site requirements set out in the Main Issues Report stated that a Masterplan would be required in taking the site forward. The Masterplan would have sought to address the concern raised by the contributor in relation to siting industrial buildings adjacent to residential use.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.



			<p>Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<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. <b>(300)</b></p>	<p>Whilst Eshiels may not have a pub or a shop, it has good access to employment and services, and there is the potential access to public transport to be improved on as Eshiels is located just off the A72. In addition, Eshiels is also located in close proximity to the Walkerburn to Peebles multi use path. It is also noted that a public footpath runs along the A72 into Peebles, although it is noted that this is on the southern side of the road. A site requirement also sets out a requirement for options for improvements to the existing public transport infrastructure will need to be explored, as well as the suitability of pedestrian provision on the A72.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

			<p>now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<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 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. <b>(269)</b></p>	<p>It is not considered that the majority of the new residents would be commuters to Edinburgh. It should be noted that the 2001 Census, Travel to Work Data found that only 20% of Peebles resident employed adults worked in Edinburgh. In addition, it is considered that Eshiels has good access to services and facilities at Peebles, including close proximity to the Walkerburn to Peebles multi use path. It is therefore considered that it would be likely that any potential development at this location would benefit Peebles High street.</p> <p>However, in light of the consultation responses received during the Main</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

			<p>Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Incorrect maps:</u></p> <p>The contributor states that there is no existing/operational sawmill as shown on the maps. <b>(269)</b></p>	This is an Ordinance Survey issue and outwith the control of the Council. Updates on the Ordinance Survey base maps will be undertaken in due course.	No further action required.
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Link road to fields to north of MESH1002:</u></p> <p>The contributor states, in respect of (MESH1002), 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.</p>	In light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for	It is recommended that the Council agree not to allocate this site within the Proposed Local

		<p>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 (MESH1002). <b>(267)</b></p>	<p>development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	<p>Development Plan.</p>
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Proposed use for the site:</u></p> <p>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. <b>(267)</b></p>	<p>Following assessment of the site, it was considered that the area could be suitable for commercial mixed use development given its location close to Peebles, and the A72.</p> <p>It is noted that promoting mixed use sites is in line with national policy and gives an opportunity to create more sustainable areas with residential and non-retail employment activities.</p> <p>In addition it is noted that the Main Issues Report did not set out the</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>

			<p>exact use for employment and mixed use sites to give the market the flexibility to satisfy demand in different sectors.</p> <p>It should be noted, that a part of the Longer Term Mixed Use site within Peebles, site SPEEB005 has been identified as having potential to come forward in the short term to accommodate business and industrial use; however, the Economic Development Section of the Council are of the view that additional land for business and industrial use needs to be identified through the Local Development Plan process.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for</p>	
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			<p>mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Pressure from developers:</u></p> <p>The contributor states that the impression they get, is that the developers are pushing for more housing in the Peebles area. <b>(257)</b></p>	<p>Historically Peebles has a vibrant market for housing development and the development industry will continue to seek further land in this area to meet demand.</p> <p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that "<i>it is not anticipated the LDP2 will require a significant number of new housing sites</i>". The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>In addition, it should be noted that the Council are also required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas. Scottish Planning Policy requires</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

			<p>LDP's to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p>	
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			As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Does not align with overall aims of strategy:</u></p> <p>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. <b>(252)</b></p>	<p>It should that site MESH1002 currently does not take the form of a woodland area.</p> <p>The SESPlan requires strategic growth in the Scottish Borders to be directed to three Strategic Development Areas (SDA) in the Central Borders, the Western Borders and the Eastern Borders.</p> <p>It should also be noted that Scottish Planning Policy requires Local Development Plans to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system. In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.



			<p>assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed</p>	
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Eshiels	MESHI002, Land at Eshiels II, Eshiels	<p><u>Broadband infrastructure:</u></p> <p>The contributor raises concerns regarding the lack of suitable broadband infrastructure. <b>(239)</b></p>	<p>LDP.</p> <p>The Scottish Borders is benefiting from the Digital Scotland Superfast Broadband rollout which is programmed to connect 94.9% of premises to Fibre to the Cabinet Broadband by the end of 2018 (this includes the additional 'Gainshare' funding). The remaining gap in provision which comprises remoter rural areas and premises which suffer from 'long lines' will be addressed by the Scottish Government's R100 programme. It is critical that the region also maximises the provision of Full Fibre Connectivity to Businesses and the wider community. Mobile phone coverage is an important complement to the rollout of Superfast Broadband. Ongoing investments by Mobile Network Operators will result in significant improvements across the Scottish Borders. Efforts are being made to ensure that this coverage will be as comprehensive as possible and that the region will benefit from 5G coverage in the future.</p>	No further action required.
Eshiels	MESHI002, Land at Eshiels II, Eshiels	<p><u>Local economy:</u></p> <p>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. <b>(216)</b></p>	<p>It should also be noted that LDP policy ED7 Business, Tourism and Leisure Development in the Countryside aims to allow for appropriate employment generating development in the countryside whilst protecting the environment and to ensure that business, tourism</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

			<p>and leisure related developments are appropriate to their location. It is not considered that any of the potential sites identified within the MIR is contrary to this policy.</p> <p>The 2001 Census, Travel to Work Data found that 20% of Peebles resident employed adults worked in Edinburgh and of these 92% were car drivers or passengers, 6% used the bus and 2% used other transport means (including motorbikes).</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p>	
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			As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Housing tenure:</u></p> <p>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. <b>(235)</b></p>	<p>It should be noted that Scottish Planning Policy (SPP) and the SDP include an affordable housing benchmark figure of 25%. The benchmark was given detailed consideration as part of the Affordable Housing SPG and this confirmed a need for 25%.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

			As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Light pollution:</u></p> <p>The contributor raises concerns regarding the introduction of light pollution for the first time, to the hamlet. <b>(197)</b></p>	<p>In relation to comments regarding light pollution, this is a detailed issue that would be considered at planning application stage.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan

Eshiels	MESHI002, Land at Eshiels II, Eshiels	<p><u>Contrary to MIR statement:</u></p> <p>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. <b>(197)</b></p>	<p>LDP.</p> <p>It is acknowledged that paragraph 5.8 of the Main Issues Report (MIR) states: “<i>The Scottish Borders is an attractive area to live and work in and the Council continues to receive many applications for housing in the countryside. Whilst supporting such proposals which can help economic growth and local village services, this must be weighed up against matters such as the protection of the Scottish Borders countryside and sustainable travel principles. The Scottish Borders has outstanding scenic qualities within its landscape and planning policy seeks to protect it</i>”.</p> <p>However, Scottish Planning Policy requires LDP’s to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system. In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.
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			<p>Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p>	
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			As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.	
Eshiels	MESH1002, Land at Eshiels II, Eshiels	<p><u>Contrary to Council's vision:</u></p> <p>The contributor states that the proposed sites do not align with the Council's vision to ensure the economic development opportunities of the Borders Railway corridor are maximised hence they contradict that vision and should be removed. <b>(252)</b></p>	<p>The SESPlan requires strategic growth in the Scottish Borders to be directed to three Strategic Development Areas (SDA) in the Central Borders, the Western Borders and the Eastern Borders.</p> <p>It should also be noted that Scottish Planning Policy requires Local Development Plans to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system. In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan



			<p>issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
Eshiels	MESH1002, Land at Eshiels II,	<p><u>Settlement boundary:</u></p> <p>The contributor states could/should Eshiels seek</p>	<p>Comments noted.</p> <p>It should be noted that had either site MESH1001 or MESH1002 been</p>	It is recommended that the Council agree not to

	Eshiels	to be a settlement boundary especially if the plan goes ahead? <b>(276)</b>	<p>allocated within the Proposed Local Development Plan (LDP) 2, then a new Development Boundary would have been drawn around Eshiels thereby giving Eshiels settlement status within the LDP.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation and following further investigation on site MESH1001 as well as taking into account the immediate need to identify land for employment use, it is recommended that a reduced site for employment only – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p> <p>Furthermore, given that it is recommended that only an employment allocation is proposed at Eshiels, it is not recommended that a new Development Boundary</p>	allocate site MESH1002 within the Proposed Local Development Plan.
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			is drawn to form a formal settlement at this location. It is noted that a similar approach has already been taken elsewhere within the LDP at St Boswells for Charlesfield.	
Eshiels	MESHI002, Land at Eshiels II, Eshiels	<p>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.</p> <p>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.</p> <p>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.</p>	<p>Comments noted.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESHI002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESHI002 within the Proposed LDP.</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

		<p>SEPA identify a potential surface water hazard.</p> <p>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. <b>(119)</b></p>		
Eshiels	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. <b>(19)</b></p>	<p>Support noted.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees including Roads Planning and their comments are incorporated into that assessment.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, including responses from some landowners stating that they are unwilling to release their land for development; as well as following further investigation on the site in relation to the need to upgrade the existing Eshiels road, of which it has now been established that upgrading of the road is not possible</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

			<p>due to the Historic Environment Scotland's restrictions around the adjacent Scheduled Monument, it is now not intended to allocate site MESH1002 within the Proposed Local Development Plan (LDP) for mixed use. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area.</p> <p>As a result of the above, it is considered inappropriate to identify site MESH1002 within the Proposed LDP.</p>	
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## 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	Proposed Response to Main Issues Raised	Recommendation
Growing our economy: Question 6	Tweeddale Mixed Use Sites	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 <b>(96)</b>	<p>It is not intended to allocate all of the sites identified within the Main Issues Report (MIR) within the Proposed Local Development Plan (LDP).</p> <p>It is noted that no alternative sites were identified within the MIR for Mixed Use, the purpose of this was to allow the community to give their views on where they would prefer development to take place. As noted within the MIR (para 4.5), a main challenge in the LDP process is to find new employment land for business and industrial use in the vicinity of Peebles. There are significant constraints in identifying both employment and housing land in this area, largely due to traffic congestion issues, the need for a new bridge to allow the town's development to the south of the River Tweed, flood risk areas and topographical constraints. Peebles remains a highly attractive town for prospective development and the LDP2 needs to consider options for both short and longer term purposes. Due to the ongoing</p>	It is recommended that the Council agree to allocate employment site - BESH1001 at Eshiels.

			<p>uncertainty as to when or indeed if a new bridge will be built, any proposals identified to the southern side of the town can only be longer term options. 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. It should be noted that for sites SCARD002 (Land at Nether Horsburgh), MESH1001 (land at Eshiels I) and MESH1002 (land at Eshiels II) were identified as potential options for mixed use, a site requirement for a Masterplan is set out within the site requirements for these sites.</p> <p>However, in light of the consultation responses received during the MIR public consultation and following further consideration on the options included within the MIR, it is recommended that a reduced site for employment – site BESH1001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist</p>	
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			in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.	
Growing our economy: Question 6	Tweeddale Additional Allocations	<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</p>	<p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that "<i>it is not anticipated the LDP2 will require a significant number of new housing sites</i>". The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>In addition, it should be noted that the Council are also required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas. Scottish Planning Policy requires LDP's to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure</p>	No further action required.



		<p>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.</p> <p><b>(145, 154, 193, 276)</b></p>	<p>to provide a plan-led system.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, Scottish Natural Heritage, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>It should be noted that VisitScotland and the Forestry Commission have also been consulted regarding the potential site allocations contained within the MIR and neither have objected.</p> <p>It is not considered that any of the proposed sites would result in ribbon development within the Tweed Valley.</p>	
<p>Growing our 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</p>	<p>Whilst the primary responsibility for operating the development planning system for the Scottish Borders lies with the Council, Circular 6/2013 Development Planning states that</p>	<p>No further action required.</p>

		<p>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.</p> <p>In addition, the contributor states that with regards to Peebles and the surrounding area, they do not agree with the preferred options discussed. <b>(318)</b></p>	<p>all interests should be engaged as early and as fully as possible. In addition that document also states “<i>key agencies are under a specific duty to co-operate in the preparation of development plans</i>”; this includes Scottish Natural Heritage, Scottish Environmental Protection Agency, Scottish Water and NHS (Health Board). The Council have consulted with all key agencies throughout the Local Development Plan process and will continue to do so. This then allows key agencies to plan according to their needs and demands also.</p> <p>It should be noted that the Local Development Plan (LDP) process is advised by the Council’s Economic Development section as to the requirement for additional land for Business and Industrial use. In addition, it should be noted that the Council through the Economic Development section and the Development Management section, receives regular enquiries from businesses to locate within the Western Strategic Development Area. Furthermore, the Council undertakes an Employment Land Audit annually to monitor the take up and availability of business and industrial land across the Borders.</p> <p>It should also be noted, that the</p>	
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			Council have not received any acceptable alternative locations for Mixed Use/ Business and Industrial sites within the Western Strategic Development Area for inclusion in the LDP2 as part of the call for sites or public consultation process on the Main Issues Report.	
Growing our economy: Question 6	SCARD002 Land at Nether Horsburgh, Cardrona	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. <b>(24)</b>	As noted within the Main Issues Report (MIR) (para 4.5), a main challenge in the Local Development Plan (LDP) process is to find new employment land for business and industrial use in the vicinity of Peebles. There are significant constraints in identifying both employment and housing land in this area, largely due to traffic congestion issues, the need for a new bridge to allow the town's development to the south of the River Tweed, flood risk areas and topographical constraints. Peebles remains a highly attractive town for prospective development and the LDP2 needs to consider options for both short and longer term purposes. Due to the ongoing uncertainty as to when or indeed if a new bridge will be built, any proposals identified to the southern side of Peebles can only be longer term options. An independent study was carried out by consultants to identify site options within the vicinity of Peebles. The study findings have informed the potential	It is recommended that the Council agree to identify site SCARD002 as a potential Longer Term Mixed Use site within the Proposed LDP.

			<p>site options set out in the MIR. It should be noted that for sites SCARD002 (Land at Nether Horsburgh), MESH1001 (land at Eshiels I) and MESH1002 (land at Eshiels II) were identified as potential options for mixed use, a site requirement for Masterplan was set out within the site requirements for these sites.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified.</p> <p>In light of the consultation responses received during the MIR public consultation and following further consideration the matter, it is recommended that site SCARD002 Land at Nether Horsburgh, is identified for potential Longer Term Mixed Use within the Proposed Local Development Plan.</p>	
<p>Growing our economy: Question 6</p>	<p>SCARD002 Land at Nether Horsburgh, Cardrona</p>	<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</p>	<p>It should be noted that site SCARD002 was identified as a potential longer term mixed use site within the Main Issues Report (MIR) and not a site to be allocated in the</p>	<p>It is recommended that the Council agree to identify site SCARD002 as a potential Longer</p>

		<p>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>short term. In addition, the MIR set out a number of site requirements that would be required to be met should that site come forward for development, these included a requirement for a Masterplan.</p> <p>It should be noted that a Development Options Study was undertaken to identify and assess options for housing and employment land in the Western Strategic Development Area, centred on the central Tweeddale area. This was due to a number of physical and infrastructure constraints within the central Tweeddale area. The study identified a number of potential short and long term housing options as well as sites for business/industrial use. Site SCARD002 was one of the sites identified in that study.</p> <p>In the consideration of any site for inclusion in the Local Development Plan (LDP), a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, Scottish Natural Heritage, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many</p>	<p>Term Mixed Use site within the Proposed LDP.</p>
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		<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. <b>(30, 159, 206, 243, 249, 276, 308)</b></p>	<p>issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>In respect to comments regarding how the new development will fit into the landscape, it is noted that a requirement has been set out for a masterplan to be produced, in addition the Landscape Section have stated that: <i>"If a Masterplanning exercise can demonstrate that this site on the north side of the A72 can successfully be connected to the Cardrona settlement to the south of the A72 and the Tweed, and that a scheme of mitigation planting would avoid diminishing the quality of this part of the Tweed valley SLA, this site has potential as a mixed use development. The re-alignment of A72 might help to create a development more unified with the existing settlement to the south"</i>.</p> <p>In respect to comments regarding traffic, the Roads Planning Section have stated that: <i>"This site has previously been considered for mixed use development. The difficulty of developing this site is the fact that the A72 runs along the southern boundary of this site with Cardrona being located on the</i></p>	
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			<p><i>opposite side of the main arterial route linking the Central Borders with the west and beyond. Any allocation of this site would have to include fundamental changes to drastically change the characteristics of the A72 through this area. The idea would be to make the A72 more of a high street rather than bypassing or dividing Cardrona. By creating a high street with dual frontage, this would allow a reduction in the traffic speed limit and help integrate both sides of the A72 into one settlement. A Transport Assessment will be required for this level of development. Master planning of the site would also be required to ensure phasing of the development is carried out in a satisfactory manner. For a development of this scale, consideration should be given to the appropriate infrastructure and amenities required to serve this site and the existing settlement profile of Cardrona, such as retail opportunities and possibly a new school. In summary, developing this site is possible but will require careful planning and a significant investment in infrastructure to create a cohesive and safe residential environment which can sustain this level of development".</i></p> <p>In respect to comments regarding</p>	
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			<p>the use of the site for the Agricultural Show, it should be noted that the Forestry Commission, who own the land, are a statutory consultee in the Development Plan process and will continue to be involved. It is also noted that the Council did not receive any objection to the inclusion of site SCARD002 within the Main Issues Report (MIR) from the Forestry Commission. In addition, the Peebles Show has been located at this location for under 10 years and was previously held in Peebles. It is therefore feasible that it may be located elsewhere in the future.</p> <p>Following consideration of the consultation responses received during the MIR public consultation, it is recommended that site SCARD002 is identified within the Proposed LDP as a potential Longer Term Mixed Use site.</p> <p>As a result of the above, it is considered appropriate to identify site SCARD002 within the Proposed LDP as a potential Longer Term Mixed Use site.</p>	
<p>Growing our economy: Question 6</p>	<p>SCARD002 Land at Nether Horsburgh, Cardrona</p>	<p>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.</p>	<p>It should be noted that site SCARD002 was identified as a potential longer term mixed use site within the Main Issues Report (MIR) and not a site to be allocated in the short term. In addition, the MIR set</p>	<p>It is recommended that the Council agree to identify site SCARD002 as a potential Longer Term Mixed Use</p>



		<p>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. <b>(46)</b></p>	<p>out a number of site requirements that would be required to be met should that site come forward for development, these included a requirement for a Masterplan. In addition, there is also a site requirement for 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>It should be noted that whilst the site is currently in agricultural use, the land is not identified as Prime Quality Agricultural Land. The identification of some greenfield / agricultural land is inevitable.</p> <p>In the consideration of any site for inclusion in the Local Development Plan (LDP), a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, Scottish Natural Heritage, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood</p>	<p>site within the Proposed LDP.</p>
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			<p>risk and landscape.</p> <p>In respect to comments regarding how the new development will fit into the landscape and the existing settlement, it is noted that a requirement has been set out for a masterplan to be produced, in addition the Landscape Section have stated that: <i>“If a Masterplanning exercise can demonstrate that this site on the north side of the A72 can successfully be connected to the Cardrona settlement to the south of the A72 and the Tweed, and that a scheme of mitigation planting would avoid diminishing the quality of this part of the Tweed valley SLA, this site has potential as a mixed use development. The re-alignment of A72 might help to create a development more unified with the existing settlement to the south”</i>.</p> <p>In respect to comments regarding traffic, the Roads Planning Section have stated that: <i>“This site has previously been considered for mixed use development. The difficulty of developing this site is the fact that the A72 runs along the southern boundary of this site with Cardrona being located on the opposite side of the main arterial route linking the Central Borders with the west and beyond. Any</i></p>	
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			<p><i>allocation of this site would have to include fundamental changes to drastically change the characteristics of the A72 through this area. The idea would be to make the A72 more of a high street rather than bypassing or dividing Cardrona. By creating a high street with dual frontage, this would allow a reduction in the traffic speed limit and help integrate both sides of the A72 into one settlement. A Transport Assessment will be required for this level of development. Master planning of the site would also be required to ensure phasing of the development is carried out in a satisfactory manner. For a development of this scale, consideration should be given to the appropriate infrastructure and amenities required to serve this site and the existing settlement profile of Cardrona, such as retail opportunities and possibly a new school. In summary, developing this site is possible but will require careful planning and a significant investment in infrastructure to create a cohesive and safe residential environment which can sustain this level of development".</i></p> <p>Following consideration of the consultation responses received during the MIR public consultation, it is recommended that site</p>	
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			SCARD002 is identified within the Proposed Local Development Plan as a potential Longer Term Mixed Use site. As a result of the above, it is considered appropriate to identify site SCARD002 within the Proposed LDP as a potential Longer Term Mixed Use site.	
Growing our 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	It should be noted that site SCARD002 was identified as a potential longer term mixed use site within the Main Issues Report (MIR) and not a site to be allocated in the short term. In addition, the MIR set out a number of site requirements that would be required to be met should that site come forward for development, these included a requirement for a Masterplan.  The SESPlan requires strategic growth in the Scottish Borders to be directed to three Strategic Development Areas (SDA) in the Central Borders, the Western Borders and the Eastern Borders.  It should also be noted that Scottish Planning Policy requires Local Development Plans (LDP) to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a	It is recommended that the Council agree to identify site SCARD002 as a potential Longer Term Mixed Use site within the Proposed LDP.

		<p>agricultural land used for food production is unwise and may impact on food security. <b>(108 (1 of 2))</b></p>	<p>minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>Whilst, brownfield land is the first consideration when identifying additional sites, as a result of limited land availability there is pressure on greenfield land for development, especially in areas where demand for housing is high. The Council therefore seeks to allocate brownfield sites as a redevelopment priority. The MIR identifies regeneration opportunities across the Borders which are suitable for a variety of uses including housing and employment.</p> <p>It should also be noted that whilst the site is currently in agricultural use, the land is not identified as Prime Quality Agricultural Land. It is therefore considered that the identification of some greenfield / agricultural land is inevitable.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, Scottish Natural Heritage, and NHS) are incorporated into that</p>	
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			<p>assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>With regards to comments relating to landscape, natural heritage, and the River Tweed, it should be noted that Scottish Natural Heritage did not object to the potential inclusion of the site within the Local Development Plan. It is also noted that, SEPA, VisitScotland, nor Historic Environment Scotland objected to the potential inclusion of site SCARD002 within the Plan.</p> <p>In respect to comments regarding how the new development will fit into the landscape and the existing settlement, it is noted that a requirement has been set out for a masterplan to be produced, in addition the Landscape Section have stated that: <i>“If a Masterplanning exercise can demonstrate that this site on the north side of the A72 can successfully be connected to the Cardrona settlement to the south of the A72 and the Tweed, and that a scheme of mitigation planting would</i></p>	
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			<p><i>avoid diminishing the quality of this part of the Tweed valley SLA, this site has potential as a mixed use development. The re-alignment of A72 might help to create a development more unified with the existing settlement to the south".</i></p> <p><i>In respect to comments regarding traffic, the Roads Planning Section have stated that: "This site has previously been considered for mixed use development. The difficulty of developing this site is the fact that the A72 runs along the southern boundary of this site with Cardrona being located on the opposite side of the main arterial route linking the Central Borders with the west and beyond. Any allocation of this site would have to include fundamental changes to drastically change the characteristics of the A72 through this area. The idea would be to make the A72 more of a high street rather than bypassing or dividing Cardrona. By creating a high street with dual frontage, this would allow a reduction in the traffic speed limit and help integrate both sides of the A72 into one settlement. A Transport Assessment will be required for this level of development. Master planning of the site would also be required to ensure phasing of the development</i></p>	
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			<p><i>is carried out in a satisfactory manner. For a development of this scale, consideration should be given to the appropriate infrastructure and amenities required to serve this site and the existing settlement profile of Cardrona, such as retail opportunities and possibly a new school. In summary, developing this site is possible but will require careful planning and a significant investment in infrastructure to create a cohesive and safe residential environment which can sustain this level of development”.</i></p> <p>Following consideration of the consultation responses received during the MIR public consultation, it is recommended that site SCARD002 is identified within the Proposed Local Development Plan as a potential Longer Term Mixed Use site. As a result of the above, it is considered appropriate to identify site SCARD002 within the Proposed LDP as a potential Longer Term Mixed Use site.</p>	
<p>Growing our economy: Question 6</p>	<p>SCARD002 Land at Nether Horsburgh, Cardrona</p>	<p>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</p>	<p>It should be noted that site SCARD002 was identified as a potential longer term mixed use site within the Main Issues Report (MIR) and not a site to be allocated in the short term. In addition, the MIR set out a number of site requirements that would be required to be met should that site come forward for</p>	<p>It is recommended that the Council agree to identify site SCARD002 as a potential Longer Term Mixed Use site within the Proposed LDP.</p>



		<p>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 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.</p> <p><b>(318)</b></p>	<p>development, these included a requirement for a Masterplan.</p> <p>The SESPlan requires strategic growth in the Scottish Borders to be directed to three Strategic Development Areas (SDA) in the Central Borders, the Western Borders and the Eastern Borders.</p> <p>In the consideration of any site for inclusion in the Local Development Plan (LDP), a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, Scottish Natural Heritage, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>With regards to comments relating to landscape whilst the site is located within the Tweed Valley Special Landscape Area, it should be noted that neither Scottish Natural Heritage nor the Council's Landscape Section objected to the</p>	
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			<p>potential inclusion of the site within the LDP.</p> <p>It is also noted that SEPA, VisitScotland, nor Historic Environment Scotland objected to the potential inclusion of site SCARD002 within the Plan.</p> <p>In respect to comments regarding how the new development will fit into the landscape and the existing settlement, it is noted that a requirement has been set out for a masterplan to be produced, in addition the Landscape Section have stated that: <i>"If a Masterplanning exercise can demonstrate that this site on the north side of the A72 can successfully be connected to the Cardrona settlement to the south of the A72 and the Tweed, and that a scheme of mitigation planting would avoid diminishing the quality of this part of the Tweed valley SLA, this site has potential as a mixed use development. The re-alignment of A72 might help to create a development more unified with the existing settlement to the south"</i>.</p> <p>In respect to comments regarding traffic, the Roads Planning Section have stated that: <i>"This site has previously been considered for mixed use development. The</i></p>	
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			<p><i>difficulty of developing this site is the fact that the A72 runs along the southern boundary of this site with Cardrona being located on the opposite side of the main arterial route linking the Central Borders with the west and beyond. Any allocation of this site would have to include fundamental changes to drastically change the characteristics of the A72 through this area. The idea would be to make the A72 more of a high street rather than bypassing or dividing Cardrona. By creating a high street with dual frontage, this would allow a reduction in the traffic speed limit and help integrate both sides of the A72 into one settlement. A Transport Assessment will be required for this level of development. Master planning of the site would also be required to ensure phasing of the development is carried out in a satisfactory manner. For a development of this scale, consideration should be given to the appropriate infrastructure and amenities required to serve this site and the existing settlement profile of Cardrona, such as retail opportunities and possibly a new school. In summary, developing this site is possible but will require careful planning and a significant investment in infrastructure to create a cohesive and safe residential</i></p>	
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			<p><i>environment which can sustain this level of development”.</i></p> <p>In respect to comments regarding the use of the site for the Agricultural Show, it should be noted that the Forestry Commission, who own the land, are a statutory consultee in the Development Plan process and will continue to be involved. It is also noted that the Council did not receive any objection to the inclusion of site SCARD002 within the MIR from the Forestry Commission. In addition, the Peebles Show has been located at this location for under 10 years and was previously held in Peebles. It is therefore feasible that it may be located elsewhere in the future.</p> <p>Following consideration of the consultation responses received during the MIR public consultation, it is recommended that site SCARD002 is identified within the Proposed Local Development Plan as a potential Longer Term Mixed Use site. As a result of the above, it is considered appropriate to identify site SCARD002 within the Proposed LDP as a potential Longer Term Mixed Use site.</p>	
Growing our 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	It should be noted that site SCARD002 was identified as a potential longer term mixed use site within the Main Issues Report (MIR)	It is recommended that the Council agree to identify site SCARD002 as

		<p>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. <b>(117)</b></p>	<p>and not a site to be allocated in the short term. In addition, the MIR set out a number of site requirements that would be required to be met should that site come forward for development, these included a requirement for a Masterplan.</p> <p>It is noted that the contributors site, ACARD003 is a housing site and does not offer the benefit of allowing for other uses to be introduced.</p> <p>In the consideration of any site for inclusion in the Local Development Plan (LDP), a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, Scottish Natural Heritage, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>It should be noted that neither Scottish Natural Heritage nor the Council's Landscape Section objected to the potential inclusion of</p>	<p>a potential Longer Term Mixed Use site within the Proposed LDP.</p>
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			<p>the site within the LDP.</p> <p>In respect to comments regarding how the new development will fit into the landscape and the existing settlement, it is noted that a requirement has been set out for a masterplan to be produced, in addition the Landscape Section have stated that: <i>“If a Masterplanning exercise can demonstrate that this site on the north side of the A72 can successfully be connected to the Cardrona settlement to the south of the A72 and the Tweed, and that a scheme of mitigation planting would avoid diminishing the quality of this part of the Tweed valley SLA, this site has potential as a mixed use development. The re-alignment of A72 might help to create a development more unified with the existing settlement to the south”</i>.</p> <p>Following consideration of the consultation responses received during the MIR public consultation, it is recommended that site SCARD002 is identified within the Proposed Local Development Plan as a potential Longer Term Mixed Use site. As a result of the above, it is considered appropriate to identify site SCARD002 within the Proposed LDP as a potential Longer Term Mixed Use site.</p>	
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<p>Growing our economy: Question 6</p>	<p>SCARD002 Land at Nether Horsburgh, Cardrona</p>	<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.</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 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</p>	<p>It is noted that a site requirement for a maintenance buffer, and water quality buffer strips have already been included. However, It is recommended that the following additional text is also included within the first site requirement: <i>“The small watercourses running through/alongside the development should be safeguarded and enhanced as part of any development”.</i></p> <p>Support and comments noted.</p>	<p>It is recommended that the Council agree to identify site SCARD002 as a potential Longer Term Mixed Use site within the Proposed LDP.</p> <p>It is also recommended that the first site requirement is amended to include: <i>“The small watercourses running through/alongside the development should be safeguarded and enhanced as part of any development”.</i></p> <p>In addition it is also recommended that the following additional site requirements are also included: <i>“The use of SUDS at the construction phase in order that the risk of pollution during construction</i></p>
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		<p>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. <b>(119)</b></p>	<p>Comments noted.</p> <p>It is recommended that the following additional site requirements are included within the Proposed Plan:</p> <ul style="list-style-type: none"> <li>• The use of SUDS at the construction phase in order that the risk of pollution during construction to the water environment is minimised</li> <li>• Foul drainage should be connected to the Scottish Water foul network at Cardrona sewage treatment works (the site is outwith the currently sewered area)</li> </ul> <p>It is also noted that reference to foul water disposal will be made within the introductory section of Volume 2 of the Proposed Local Development Plan.</p>	<p><i>to the water environment is minimised” and “Foul drainage should be connected to the Scottish Water foul network at Cardrona sewage treatment works (the site is outwith the currently sewered area)”.</i></p> <p>It is also noted that reference to foul water disposal will be made within the introductory section of Volume 2 of the Proposed Local Development Plan.</p>
<p>Growing our 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</p>	<p>Comments noted.</p> <p>It should be noted that site SCARD002 was identified as a potential longer term mixed use site within the Main Issues Report (MIR) and not a site to be allocated in the short term. In addition, the MIR set out a number of site requirements that would be required to be met should that site come forward for development, these included a requirement for a Masterplan. Following consideration of the</p>	<p>It is recommended that the Council agree to identify site SCARD002 as a potential Longer Term Mixed Use site within the Proposed LDP.</p> <p>It is also recommended that the following additional site</p>



		<p>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. <b>(164)</b></p>	<p>contributors comments, it is now also proposed to include the following additional site requirement:</p> <ul style="list-style-type: none"> <li>The design and layout of the proposed development will require to take into account any potential for setting impacts on the Nether Horsburgh Castle Scheduled Monument.</li> </ul> <p>Following consideration of the consultation responses received during the MIR public consultation, it is recommended that site SCARD002 is identified within the Proposed Local Development Plan (LDP) as a potential Longer Term Mixed Use site. As a result of the above, it is considered appropriate to identify site SCARD002 within the Proposed LDP as a potential Longer Term Mixed Use site and include the above additional site requirement.</p>	<p>requirement is also included in the Proposed Plan:</p> <ul style="list-style-type: none"> <li>The design and layout of the proposed development will require to take into account any potential for setting impacts on the Nether Horsburgh Castle Scheduled Monument.</li> </ul>
<p>Growing our 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</p>	<p>It should be noted that site SCARD002 was identified as a potential longer term mixed use site within the Main Issues Report (MIR) and not a site to be allocated in the short term. In addition, the MIR set out a number of site requirements that would be required to be met should that site come forward for development, these included a requirement for a Masterplan.</p> <p>It should also be noted that Scottish</p>	<p>It is recommended that the Council agree to identify site SCARD002 as a potential Longer Term Mixed Use site within the Proposed LDP.</p>

		<p>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. <b>(213)</b></p>	<p>Planning Policy requires Local Development Plans (LDP) to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>It should be noted that a Development Options Study was undertaken to identify and assess options for housing and employment land in the Western Strategic Development Area, centred on the central Tweeddale area. This was due to a number of physical and infrastructure constraints within the central Tweeddale area. The study identified a number of potential short and long term housing options as well as sites for business/industrial use. Site SCARD002 was one of the sites identified in that study. The study findings have informed the potential site options set out in the MIR.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and</p>	
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			<p>external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, Scottish Natural Heritage, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>In respect to comments regarding how the new development will fit into the landscape and the existing settlement, it is noted that a requirement has been set out for a masterplan to be produced, in addition the Landscape Section have stated that: <i>“If a Masterplanning exercise can demonstrate that this site on the north side of the A72 can successfully be connected to the Cardrona settlement to the south of the A72 and the Tweed, and that a scheme of mitigation planting would avoid diminishing the quality of this part of the Tweed valley SLA, this site has potential as a mixed use development. The re-alignment of A72 might help to create a development more unified with the existing settlement to the south”</i>.</p>	
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			<p>Following consideration of the consultation responses received during the MIR public consultation, it is recommended that site SCARD002 is identified within the Proposed Local Development Plan as a potential Longer Term Mixed Use site. As a result of the above, it is considered appropriate to identify site SCARD002 within the Proposed LDP as a potential Longer Term Mixed Use site.</p>	
<p>Growing our economy: Question 6</p>	<p>Potential for Business within Glentress Tourist Asset</p>	<p>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. <b>(197)</b></p>	<p>The Glentress Masterplan for this area takes this into account and requires any such application to submit a retail/commercial justification report.</p>	<p>No further action required.</p>
<p>Growing our economy: Question 6</p>	<p>MLAMA001 Lamancha Mixed Use, Lamancha</p>	<p>The contributor seeks the allocation of site MLAMA001 for business or housing. <b>(75)</b></p>	<p>It is noted that the Lamancha is not a recognised settlement within the Local Development Plan. In considering this site, the site assessment found that Lamancha has limited access to public transport and services; in addition, the Contaminated Land Officer has indicated that the site is a brownfield site and may present development constraints. Furthermore, the Roads Planning section are unable to support the full extent of the site for mixed use however, they may be able to support a reduced site for business and industrial use. It should also be noted that, development at this location can be</p>	<p>It is recommended that the Council agree to not allocate this site within the Proposed Local Development Plan.</p>

			<p>considered through the submission of a planning application.</p> <p>The Council have a supportive policy for this type of development in terms of Policy ED7 'Business, Tourism and Leisure Development in the Countryside'. Therefore, it is considered that this proposal can be considered against that policy as well as other appropriate policies through the Development Management process should a planning application be submitted.</p> <p>Policy ED7 aims to allow for appropriate employment generating development in the countryside whilst protecting the environment and ensuring that developments are appropriate to their location.</p>	
<p>Growing our economy: Question 6</p>	<p>MLAUD002 Stow Road Mixed Use, Lauder</p>	<p>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. <b>(304)</b></p>	<p>The site was submitted as part of the Main Issues Report public consultation.</p> <p>Following a full site assessment it is considered that site MLAUD002 is not appropriate for allocation. The site is located to the south-west of the Allanbank estate wall which forms a strong physical separation with the settlement, and although there are mature trees along the north boundary with Stow Road which assist in screening site, the site sits outwith Development Boundary and is also located within the outer zone of a hazard pipeline.</p>	<p>It is recommended that the Council does not identify site MLAUD002 as a mixed use site in the Proposed Local Development Plan.</p>

			<p>In addition to the above, it is noted that Lauder is located outwith any of the Strategic Development Areas, and it is considered that the settlement has already a sufficient housing land supply with two allocated housing sites - sites ALAUD001 and ELA12B with a combined indicative capacity of 130 units.</p> <p>In conclusion, for the reasons above, the proposed mixed use site will not be included within the Proposed Plan.</p>	
<p>Growing our economy: Question 6</p>	<p>MLAUD003 Whitlaw Road Mixed Use, Lauder</p>	<p>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. <b>(304)</b></p>	<p>The site was submitted as part of the Main Issues Report public consultation.</p> <p>Following a full site assessment it is considered that site MLAUD003 is not appropriate for allocation. Economic Development do not support a mixed use proposal on this site, especially if this includes a housing element. They do not consider it is appropriate for housing development to be accessed through the estate if possible, as there are other more appropriate sites available. They advise that the current zoning should be protected.</p> <p>As noted above, the site is a safeguarded business and industrial site, under Policy ED1. Policy ED1 aims to ensure that adequate</p>	<p>It is recommended that the Council does not identify site MLAUD003 as a mixed use site in the Proposed Local Development Plan.</p>

			<p>supplies of business and industrial land are retained and not diluted by the proliferation of other uses. Policy ED1 states that development other than Classes 4, 5 and 6, may be accepted on district business and industrial sites, in order, where appropriate, allow a more mixed use area. This is subject to assessment against criteria contained within Policy ED1. Therefore, the current Policy ED1 allows, in certain cases, a mix of uses within district sites. However, it should be noted that this excludes retail proposals. It is considered that there is existing flexibility within Policy ED1 to allow for such alternative, mixed use proposals to be considered, albeit with the exception of retail. Furthermore, business and industrial land is increasingly challenging to find within settlements and a mixed use allocation would result in the loss of part of the safeguarded allocation (zEL61). It is further noted that a housing development would likely result in a conflict of land uses, being located within an established industrial estate.</p> <p>In addition to the above, it is noted that Lauder is located outwith any of the Strategic Development Areas, and it is considered that the settlement has already a sufficient</p>	
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			<p>housing land supply with two allocated housing sites - sites ALAUD001 and ELA12B with a combined indicative capacity of 130 units.</p> <p>In conclusion, for the reasons above, the proposed mixed use site will not be included within the Proposed Plan. However, it is proposed to retain the site as a safeguarded business and industrial site. This would allow alternative, mixed use proposals to be assessed against the Policy ED1.</p>	
<p>Growing our economy: Question 6</p>	<p>MOXTO001 Oxton South West, Oxton</p>	<p>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 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"> <li>• School/Hall/Shop – (Can we consider and re-look at a ‘Hub’ accommodating these within one facility?)</li> <li>• 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</li> <li>• Utilities – Gas and Broadband can we negotiate with suppliers’ new opportunities (Would the utilities cope with the increased demand this volume of housing and people would place on them?)</li> </ul>	<p>The site was submitted as part of the Main Issues Report public consultation.</p> <p>Following a full site assessment it is considered that site MOXTO001 is not appropriate for allocation. This is a large site which is being proposed as a mixed use site to potentially incorporate housing, a school and community facilities. The Roads Planning Team are not supportive of the site unless solutions can be found to overcome the issues they have identified. The main issues that the Roads Planning Team have identified are:</p> <p><i>“There is a difference in level between this site and the public road (Main Street), but a main access into the site should be</i></p>	<p>It is recommended that the Council does not identify site MOXTO001 as a mixed use site in the Proposed Local Development Plan.</p>



		<ul style="list-style-type: none"> <li>Roads &amp; Paths - must be reviewed and developed to incorporate the future development and enhance the existing paths, pavements, roads and lighting.</li> </ul> <p><b>(328)</b></p>	<p><i>achievable at the south westerly end of the road frontage close to the existing track. There is potential for direct access from the existing public road (Main Street) to individual dwellings if the accesses can be dug in at suitable gradients. .... For good street connectivity, a secondary access will be required onto The Loan and I have concerns over this prospect.</i></p> <p><i>The Loan leading to the site often has extensive lengths of parking on the street which forces single file traffic over significant lengths all the way from the junction with the Main Street/Station Road and round the horizontal curve in the road. This already causes issues with traffic flow. A solution to this would be fundamental to gaining my support for the development of this site. One solution would be to widen the carriageway on the west side of the initial length of The Loan to facilitate on-street parking and two-way traffic flow past the parked cars. This would require a retaining structure, would impact on an embankment and hedging adjacent to the road and would appear to affect third party land.</i></p> <p><i>Furthermore, junction visibility where The Loan joins Main Street/Station Road is restricted due</i></p>	
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			<p><i>to the close proximity of the corner building on the east side combined with the alignment of the Main Street/Station Road. There are no obvious solutions to these concerns and additional traffic would exacerbate the situation. That said, the visibility restrictions appear to control traffic speeds to acceptable levels for the situation. ...”</i></p> <p>In addition, there is a hazard pipeline running through the site and a Health and Safety Executive (HSE) PADHI+ assessment has been carried out via the HSE website for the north-western part of the site). The outcome of this stated: HSE's Advice: Advise Against. The assessment indicates that the risk of harm to people at the proposed development site is such that HSE's advice is that there are sufficient reasons on safety grounds, for advising against the granting of planning permission in this case.</p> <p>In conclusion, due to the reasons mentioned above it is not considered appropriate to include this site within the Proposed Plan.</p>	
Growing our 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.	It should be noted that the Main Issues Report (MIR) did not identify any new short term proposals for development south of the River Tweed at Peebles. However two potential longer term sites were	It is recommended that the Council agree to allocate employment site - BESH1001 within the Proposed Local

		<p>Contributor 155 states that in areas such as Peebles where the infrastructure is creaking, development of business units should be promoted strongly elsewhere.</p> <p>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.</p> <p><b>(73, 155, 197,)</b></p>	<p>identified, site SPEEB008 Land West of Edderston Ridge (longer term mixed use) and site SPEEB009 East of Cademuir Hill (longer term housing). The MIR identified a potential new housing site to the north of the River Tweed, site APEEB056 Land South of Chapelhill Farm.</p> <p>It should be noted that the Local Development Plan Review is undertaken in consultation with both internal and external consultees such as Roads Planning, Economic Development, NHS, Scottish Water and SEPA. In addition, Scottish Planning Policy requires that a range and choice of sites are identified. In doing this rigorous site assessment process, the best sites possible are identified.</p> <p>It is acknowledged that there is a shortage of employment land within the Peebles Area. It should be noted, that a part of the Longer Term Mixed Use site within Peebles, site SPEEB005 has been identified as having potential to come forward in the short term to accommodate business and industrial use.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation and following further investigation, it</p>	<p>Development Plan.</p>
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			<p>is recommended that a site for employment at Eshiels – site BSHI001 Land at Eshiels, is taken forward into the Proposed Local Development Plan. This is likely to involve the Council undertaking a compulsory purchase order as is often common practice for such allocations, and it would be envisaged that SOSEP (South of Scotland Economic Partnership) funding would be available to assist in the delivery of the site. Clearly in order for the site to be satisfactorily developed substantial perimeter planting will be required to be carried out at an early stage.</p>	
<p>Growing our economy: Question 6</p>	<p>Safeguarding sites for Employment and Economic Purposes - Peebles</p>	<p>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  Dagleish Garage, Old Town  Hydro Hotel, Innerleithen Road</p>	<p>It is noted that no consultation has been undertaken with the landowners / lessees of the areas listed within the contributor's submission proposed for safeguarding. In addition, any potential planning application may be considered against Local Development Plan (LDP) Policy ED5: Regeneration. The aim of that policy is to encourage the redevelopment of such areas of land for a variety of uses including housing, employment or retailing which will support the opportunity of bringing such land back into productive use and to enhance the surrounding environment.</p> <p>It should also be noted that where a</p>	<p>No further action required.</p>

		<p>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.  <b>(318)</b></p>	<p>business closes, or ceases to trade, the Planning Authority cannot expect the landowner to retain an employment / business use onsite particularly if it is unviable to do so. Furthermore, as a settlement develops, the character of an area may change, and it may not be appropriate or possible for traditional uses to remain.</p> <p>In addition, if one of the businesses identified wished to relocate/relocate to expand, the approach suggested by the Community Council is that this could not happen until another business took over the premises. Such interest may well be very limited, over an excessive period of time, and effectively this would be a major embargo on the expansion/development opportunities for the listed businesses.</p> <p>In respect to Harbro and South Park Garage at South Parks, and the various units at Cavalry Park identified within the contributor's submission, it is noted that both South Park and Cavalry Park are already safeguarded sites within the LDP.</p>	
<p>Growing our economy:  Question 6</p>	<p>SPEEB005  Peebles East  (South of the River)</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>Comments noted.  It should be noted that site MPEEB004 is part of the potential longer term mixed use site</p>	<p>It is recommended that the Council retains site SPEEB005 as a</p>

	<p>(Sites MPEEB004 and MPEEB008 also referenced in submission), Peebles</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> <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</p>	<p>SPEEB005 as identified within the Local Development Plan 2016. The Main Issues Report did not propose to remove site SPEEB005 from the Plan.</p> <p>It is also noted that a planning application for the site has been submitted (17/00606/PPP) and that application was refused planning permission.</p> <p>The current Adopted Local Development Plan (LDP) sets out a number of site requirements for site SPEEB005, it is considered that those requirements will also be incorporated into the new Proposed Plan. It is considered that the site requirements set out are necessary to ensure that the development of the site is appropriate. This includes a site requirement for a new bridge over the River Tweed. It is the opinion of the Roads Planning section that a new bridge over the River Tweed is necessary in order for this site to come forward. However, it is considered that the site has the potential to assist in providing an element of Business and Industrial land during the lifetime of the LDP and therefore the site requirements for the site state that: "<i>There is currently a shortfall of good quality business and industrial land in Peebles. This is a mixed use site and employment land could come forward early to meet this</i></p>	<p>potential longer term mixed use site in the Proposed Local Development Plan.</p> <p>It is further recommended that the Council retain the option to release land at this location for Business and Industrial Use during the lifetime of the Local Development Plan 2.</p>
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		<p>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. 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. 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. <b>(111)</b></p>	<p><i>shortfall</i>. In relation to the contributors other comments, it is considered that there are other more appropriate sites available within the Western Strategic Development Area. As a result of the above, it is considered inappropriate to allocate site SPEEB005 (MPEEB004 or MPEEB008) within the Proposed LDP.</p>	
<p>Growing our economy: Question 6</p>	<p>SPEEB008 Land West of Edderston Ridge, Peebles</p>	<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. <b>(6 (1 of 2), 101, 309)</b></p>	<p>Support noted and comments noted. However, following the Main Issues Report public consultation, and as a result of further consideration on the matter, it is proposed that this site SPEEB008 will not be taken forward into the Proposed Local Development Plan as a potential longer term mixed use site. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area. It is also noted that the Plan already identifies three potential longer term sites within Peebles and it is intended that those sites - SPEEB003, SPEEB004 and SPEEB005 will be retained within the Plan.</p> <p>As a result of the above, it is considered inappropriate to identify site SPEEB008 within the Proposed LDP. However, it is acknowledged</p>	<p>It is recommended that the Council does not identify site SPEEB008 as a potential longer term mixed use site in the Proposed Local Development Plan.</p>

			<p>that the site could be considered again for inclusion in a future LDP.</p> <p>In respect to the potential new bridge over the River Tweed at Peebles, the most recent traffic count on behalf of the Council for Tweed Bridge was undertaken in November 2018 and through this it was demonstrated that the bridge is getting close to capacity. It is the Council's opinion that Tweed Bridge does not have the capacity to serve any new development in the town, over and above the sites allocated in the plan, with the exception of small infill proposals and other low traffic generating proposals which will be considered on a case by case basis. Longer term development in the town will be required to contribute towards a second river crossing based on projected costs. At this point in time there is no definitive date as to when the new bridge might be constructed and a feasibility study must be prepared in advance. In this interim period development sites need to contribute towards improving traffic management in and around the town centre and/or towards the funding of transport appraisal work for the town.</p>	
Growing our economy: Question 6	SPEEB008 Land West of Edderston	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	Comments noted. However, following the Main Issues Report public consultation, and as a	It is recommended that the Council does not identify



	Ridge, Peebles	<p>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 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. <b>(25 (1 of 2))</b></p>	<p>result of further consideration on the matter, it is proposed that this site SPEEB008 will not be taken forward into the Proposed Local Development Plan (LDP) as a potential longer term mixed use site. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area. It is also noted that the Plan already identifies three potential longer term sites within Peebles and it is intended that those sites - SPEEB003, SPEEB004 and SPEEB005 will be retained within the Plan.</p> <p>As a result of the above, it is considered inappropriate to identify site SPEEB008 within the Proposed LDP.</p> <p>In relation to comments regarding roads, the Roads Planning Section have stated that: "... <i>The problem with Caledonian Road is parking in the carriageway, forcing single file traffic, and the issue with South Parks is the tortuous nature of the initial length of the road off the mini roundabout. That said, there may be scope for tackling some of the capacity issues and one benefit of this land is its relative close proximity to the town centre. This favours well from a sustainable transport point of view. If this area is</i></p>	<p>site SPEEB008 as a potential longer term mixed use site in the Proposed Local Development Plan.</p>
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			<p><i>to be developed for mixed use development it should be dependent on measures being taken to improve the capacity of the roads leading to the site. The extent of the site suitable for development, possibly not all of it, will be dependent on the extent of off-site improvements and the findings of a Transport Assessment. Development will have to integrate and connect with the existing housing land to the east by way of access linkage with South Parks, Edderston Ridge/Edderston Ridge Park and Edderston Road. This will help with dispersion of traffic. ..."</i></p>	
<p>Growing our economy: Question 6</p>	<p>SPEEB008 Land West of Edderston Ridge, Peebles</p>	<p>The contributors state that the traffic on the narrow Caledonain 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</p>	<p>Comments noted. It should be noted that site SPEEB008 was identified as a potential longer term mixed use site within the Main Issues Report (MIR) and not a site to be allocated in the short term. In addition, the MIR set out a number of site requirements that would be required to be met should that site come forward for development, these included a requirement for a Masterplan.</p> <p>In respect to comments regarding the surrounding road network, the Roads Planning Section have stated that: "... <i>The extent of the site suitable for development, possibly not all of it, will be dependent on the extent of off-site improvements and</i></p>	<p>It is recommended that the Council does not identify site SPEEB008 as a potential longer term mixed use site in the Proposed Local Development Plan.</p>

		<p>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. 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</p>	<p><i>the findings of a Transport Assessment. Development will have to integrate and connect with the existing housing land to the east by way of access linkage with South Parks, Edderston Ridge/Edderston Ridge Park and Edderston Road. This will help with dispersion of traffic. ...”</i></p> <p>In respect to comments regarding the Tweed Bridge, the most recent traffic count on behalf of the Council for Tweed Bridge was undertaken in November 2018 and through this it was demonstrated that the bridge is getting close to capacity. It is the Council’s opinion that Tweed Bridge does not have the capacity to serve any new development in the town, over and above the sites allocated in the plan, with the exception of small infill proposals and other low traffic generating proposals which will be considered on a case by case basis. Longer term development in the town will be required to contribute towards a second river crossing based on projected costs. At this point in time there is no definitive date as to when the new bridge might be constructed and a feasibility study must be prepared in advance.</p> <p>In the consideration of any site for inclusion in the Local Development</p>	
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		<p>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> <p>The contributor states that mixed use is not appropriate for the site, due to the narrow access roads.</p> <p><b>(30, 46,111, 114, 127 (1 of 3), 181, 206, 222, 270, 273)</b></p>	<p>Plan, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>However, following the MIR public consultation, and as a result of further consideration on the matter, it is proposed that this site SPEEB008 will not be taken forward into the Proposed Local Development Plan as a potential longer term mixed use site. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area. It is also noted that the Plan already identifies three potential longer term sites within Peebles and it is intended that those sites - SPEEB003, SPEEB004 and SPEEB005 will be retained within the Plan.</p> <p>As a result of the above, it is</p>	
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			considered inappropriate to identify site SPEEB008 within the Proposed LDP.	
Growing our 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. 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. It is considered that the proposed development that is estimated to be in the range of 450 units will gridlock the existing roads. <b>(80)</b></p>	Refer to response above relating to site SPEEB008.	It is recommended that the Council does not identify site SPEEB008 as a potential longer term mixed use site in the Proposed Local Development Plan.

<p>Growing our economy: Question 6</p>	<p>SPEEB008 Land West of Edderston Ridge, Peebles</p>	<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 their occupants doing more journeys to get to work, shops, etc as there are</p>	<p>Comments noted. However, following the Main Issues Report public consultation, and as a result of further consideration on the matter, it is proposed that this site SPEEB008 will not be taken forward into the Proposed Local Development Plan (LDP) as a potential longer term mixed use site. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area. It is also noted that the Plan already identifies three potential longer term sites within Peebles and it is intended that those sites - SPEEB003, SPEEB004 and SPEEB005 will be retained within the Plan. As a result of the above, it is considered inappropriate to identify site SPEEB008 within the Proposed LDP.  In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many</p>	<p>It is recommended that the Council does not identify site SPEEB008 as a potential longer term mixed use site in the Proposed Local Development Plan.</p>
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		<p>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. <b>(108 (2 of 2))</b></p>	<p>issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>In respect to comments regarding the surrounding road network, the Roads Planning Section have stated that: “... <i>The extent of the site suitable for development, possibly not all of it, will be dependent on the extent of off-site improvements and the findings of a Transport Assessment. Development will have to integrate and connect with the existing housing land to the east by way of access linkage with South Parks, Edderston Ridge/Edderston Ridge Park and Edderston Road. This will help with dispersion of traffic. ...</i>” In addition, the Roads Planning Section have not objected to the identification of the site as a potential longer term development site.</p> <p>With regards to comments relating to landscape, natural heritage, and the River Tweed, it should be noted that Scottish Natural Heritage did not object to the potential inclusion of the site within the LDP. Furthermore it is also noted that SEPA also, did not object to the potential inclusion of the site within the Plan.</p>	
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<p>Growing our economy: Question 6</p>	<p>SPEEB008 Land West of Edderston Ridge, Peebles</p>	<p>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. <b>(318)</b></p>	<p>Comments noted. However, following the Main Issues Report public consultation, and as a result of further consideration on the matter, it is proposed that this site SPEEB008 will not be taken forward into the Proposed Local Development Plan (LDP) as a potential longer term mixed use site. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area. It is also noted that the Plan already identifies three potential longer term sites within Peebles and it is intended that those sites - SPEEB003, SPEEB004 and SPEEB005 will be retained within the Plan. As a result of the above, it is considered inappropriate to identify site SPEEB008 within the Proposed LDP.</p> <p>In respect to comments regarding the surrounding road network, the Roads Planning Section have stated that: <i>“... The extent of the site suitable for development, possibly not all of it, will be dependent on the extent of off-site improvements and the findings of a Transport Assessment. Development will have to integrate and connect with the existing housing land to the east by way of access linkage with South</i></p>	<p>It is recommended that the Council does not identify site SPEEB008 as a potential longer term mixed use site in the Proposed Local Development Plan.</p>
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			<p><i>Parks, Edderston Ridge/Edderston Ridge Park and Edderston Road. This will help with dispersion of traffic. ...”</i></p> <p>With regards to comments relating to landscape and that the site is located on the edge of a National Scenic Area and is part of the Special Landscape Area, it should be noted that neither Scottish Natural Heritage or the Council’s Landscape Section objected to the potential inclusion of the site within the LDP. However, the Council’s Landscape Section have stated: “... <i>A scheme of structure planting will be required to create a landscape fit as well as define the limit of settlement expansion in this immediate area – this may be in response to the contours rather than existing field boundaries and should seek to protect the amenity of the existing adjacent housing as well as help to reduce the scale of the site by creating tree belts, green corridors and a hierarchy of circulation built into the landscape structure.”</i></p>	
Growing our 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. <b>(283)</b>	Comments noted. However, following the Main Issues Report public consultation, and as a result of further consideration on the matter, it is proposed that this site SPEEB008 will not be taken forward into the Proposed Local	It is recommended that the Council does not identify site SPEEB008 as a potential longer term mixed use site in the Proposed

			<p>Development Plan (LDP) as a potential longer term mixed use site. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area. It is also noted that the Plan already identifies three potential longer term sites within Peebles and it is intended that those sites - SPEEB003, SPEEB004 and SPEEB005 will be retained within the Plan.</p> <p>As a result of the above, it is considered inappropriate to identify site SPEEB008 within the Proposed LDP. However, it is acknowledged that the site could be considered again for inclusion in a future LDP.</p> <p>In respect to comments the need for improved transport links, the Roads Planning Section have stated that:  <i>“Any further development on the south side of the River Tweed is reliant on a new river crossing due to issues over capacity, High Street amenity and the reliance on a single bridge for the south side of Peebles. ... The problem with Caledonian Road is parking in the carriageway, forcing single file traffic, and the issue with South Parks is the tortuous nature of the initial length of the road off the mini roundabout. That said, there may be scope for tackling some of the capacity issues</i></p>	Local Development Plan.
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			<p><i>and one benefit of this land is its relative close proximity to the town centre. This favours well from a sustainable transport point of view. If this area is to be developed for mixed use development it should be dependent on measures being taken to improve the capacity of the roads leading to the site. The extent of the site suitable for development, possibly not all of it, will be dependent on the extent of off-site improvements and the findings of a Transport Assessment. Development will have to integrate and connect with the existing housing land to the east by way of access linkage with South Parks, Edderston Ridge/Edderston Ridge Park and Edderston Road. This will help with dispersion of traffic. ...”</i></p>	
<p>Growing our economy: Question 6</p>	<p>SPEEB008 Land West of Edderston Ridge, Peebles</p>	<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 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</p>	<p>Comments noted. However, following the Main Issues Report public consultation, and as a result of further consideration on the matter, it is proposed that this site SPEEB008 will not be taken forward into the Proposed Local Development Plan (LDP) as a potential longer term mixed use site. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area. It is also noted that the Plan already identifies three potential longer term sites within</p>	<p>It is recommended that the Council does not identify site SPEEB008 as a potential longer term mixed use site in the Proposed Local Development Plan.</p>

		<p>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.</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 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</p>	<p>Peebles and it is intended that those sites - SPEEB003, SPEEB004 and SPEEB005 will be retained within the Plan.</p> <p>As a result of the above, it is considered inappropriate to identify site SPEEB008 within the Proposed LDP.</p>	
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		permissions to be sought for certain activities from SEPA. <b>(119)</b>		
Growing our 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. <b>(164)</b>	<p>Comments noted.</p> <p>However, following the Main Issues Report public consultation, and as a result of further consideration on the matter, it is proposed that this site SPEEB008 will not be taken forward into the Proposed Local Development Plan (LDP) as a potential longer term mixed use site. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area. It is also noted that the Plan already identifies three potential longer term sites within Peebles and it is intended that those sites - SPEEB003, SPEEB004 and SPEEB005 will be retained within the Plan.</p> <p>As a result of the above, it is considered inappropriate to identify site SPEEB008 within the Proposed LDP.</p> <p>In respect to the potential new bridge over the River Tweed at Peebles, whilst no decision has been made as to when or even where the new bridge will be constructed, it is anticipated that any new crossing will be located to the east of the existing bridge in the town, therefore there would be minimal impact on the setting of the</p>	It is recommended that the Council does not identify site SPEEB008 as a potential longer term mixed use site in the Proposed Local Development Plan.

<p>Growing our economy: Question 6</p>	<p>SPEEB008 Land West of Edderston Ridge, Peebles</p>	<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"> <li>• Green networks through the site which integrate SUDS and active travel infrastructure, this should include providing links through the site to the nearby school.</li> <li>• Recreational links, for example to Manor Sware viewpoint and the River Tweed should be retained or re-established in appropriate form.</li> </ul> <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. <b>(213)</b></p>	<p>category ‘A’ listed Neidpath Castle. Comments noted. However, following the Main Issues Report public consultation, and as a result of further consideration on the matter, it is proposed that this site SPEEB008 will not be taken forward into the Proposed Local Development Plan (LDP) as a potential longer term mixed use site. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area. It is also noted that the Plan already identifies three potential longer term sites within Peebles and it is intended that those sites - SPEEB003, SPEEB004 and SPEEB005 will be retained within the Plan. As a result of the above, it is considered inappropriate to identify site SPEEB008 within the Proposed LDP.</p>	<p>It is recommended that the Council does not identify site SPEEB008 as a potential longer term mixed use site in the Proposed Local Development Plan</p>
<p>Growing our economy: Question 6</p>	<p>SPEEB008 Land West of Edderston Ridge,</p>	<p>The contributor recommends that the Council works in partnership with the Tweed Forum to devise the best mitigation solutions regarding their concerns to trees. <b>(199)</b></p>	<p>Comments noted. However, following the Main Issues Report public consultation, and as a result of further consideration on the</p>	<p>It is recommended that the Council does not identify site SPEEB008 as</p>

	Peebles		<p>matter, it is proposed that this site SPEEB008 will not be taken forward into the Proposed Local Development Plan (LDP) as a potential longer term mixed use site. It is considered that there are other more appropriate sites that can be allocated within the Proposed Plan within the Western Strategic Development Area. It is also noted that the Plan already identifies three potential longer term sites within Peebles and it is intended that those sites - SPEEB003, SPEEB004 and SPEEB005 will be retained within the Plan.</p> <p>As a result of the above, it is considered inappropriate to identify site SPEEB008 within the Proposed LDP.</p>	a potential longer term mixed use site in the Proposed Local Development Plan.
Growing our 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. <b>(155)</b>	It is noted that the settlement of Walkerburn benefits from a Redevelopment allocation, site zR200 Caberston Farm/Old Mill Site. It should be noted that that allocation allows for a variety of uses including housing, employment or retailing to potentially come forward onsite subject to the processing of a relevant planning application. This allocation not only promotes the opportunity of bringing such land back into productive use but will also support the enhancement of the area.	No further action required.
Growing our economy:	Business and Industry - West	The contributor considers that there is a definite requirement for Business and Industry land in	Comments noted. It is noted that the potential areas	It is recommended that the Council

Question 6	Linton	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. <b>(1 (3 of 3))</b>	identified for Business and Industrial Use are located outwith the Development Boundary and as such could be considered under Local Development Plan Policy ED7 Business, Tourism and Leisure Development in the Countryside.  In addition, it should be noted that the current Adopted Local Development Plan allocates one Business and Industrial site – site zEL18 at West Linton. Scottish Planning Policy states that “ <i>Local development plans should allocate a range of sites for business, taking account of the current market demand; location, size, quality and infrastructure requirements</i> ”. The continued allocation of the site is supported by the Council’s Economic Development section.	can consider this proposal through the Development Management Process.
Growing our 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. <b>(302)</b>	Comments noted.  In light of the consultation responses received during the Main Issues Report public consultation and following further consideration on the matter, primarily due to the change in ownership and the existence of an already allocated employment site (zEL18) it is now not considered appropriate to allocate site BWEST003 within the Proposed Plan.	It is recommended that the Council agree to not allocate this site within the Proposed Local Development Plan.
Growing our economy:	Business and Industry,	The contributor states that the only thing that is good is the lack of industrial units in West Linton	It should be noted that the current Adopted Local Development Plan	It is recommended that the Council



Question 6	West Linton	<p>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. <b>(240)</b></p>	<p>allocates one Business and Industrial site – site zEL18. Scottish Planning Policy states that “<i>Local development plans should allocate a range of sites for business, taking account of the current market demand; location, size, quality and infrastructure requirements</i>”. The continued allocation of the site is supported by the Council’s Economic Development section.</p>	<p>agree to retain site zEL18 as an allocated employment site within the Proposed Local Development Plan.</p>
Growing our economy: Question 6	BWEST003 Deanfoot Road North, West Linton	<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. 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. 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</p>	<p>Comments noted.</p> <p>In light of the consultation responses received during the Main Issues Report public consultation and following further consideration on the matter, primarily due to the change in ownership and the existence of an already allocated employment site (zEL18) it is now not considered appropriate to allocate site BWEST003 within the Proposed Plan.</p>	<p>It is recommended that the Council agree to not allocate this site within the Proposed Local Development Plan.</p>

		<p>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.</p> <p>Depending on the use of the proposed units there may be a requirement for permissions to be sought for certain activities from SEPA. <b>(119)</b></p>		
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## 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	Proposed Response to Main Issues Raised	Recommendation
Ancrum	AANCR002, Dick's Croft II	<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 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.</p> <p><b>(119)</b></p> <p>The contributor considers the site should be taken forward as a preferred site not an alternative site.</p> <p><b>(122, 174)</b></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</p>	<p>This site was identified within the Main Issues Report as an 'alternative' site however it was acknowledged that there is a cumulative impact issue associated with the site given the location of the site immediately adjacent to a recent development in the village, at Myrescroft. The site assessment concludes the following:</p> <p><i>'Overall the site is assessed as acceptable however it should be noted the site is within a Special Landscape Area and careful consideration must be given to boundary treatments, the landscape and visual impact mitigation as well as the site design. Due to recent development within Ancrum consideration should be given to the scale of the proposal and its effect on the size of the settlement and the character of the village and it's Conservation Area. Allocation of this site would increase pressure on services since the previous housing allocation has only recently been completed and further discussions would need to be held with Scottish</i></p>	<p>It is recommended that the Council agrees not to allocate this site (AANCR002) within the Proposed Local Development Plan.</p>

		<p>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. <b>(122)</b></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. <b>(199)</b></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. <b>(213)</b></p>	<p><i>Water in relation to wastewater treatment as the development is required to connect to the existing Scottish Water foul network.</i></p> <p><i>Structure planting to the south and west would be required to reduce visual impact from the countryside and create an edge to the settlement. Existing hedgerows would need to be retained or improved where possible. Mitigation measures are required to prevent any impact on the River Tweed SAC. Mitigation measures are also required in relation to the impact of surface water runoff from nearby hills and this should be considered during the design stage.</i></p> <p><i>Vehicular access is acceptable from all existing roads adjacent to the site and a strong street frontage onto these roads is recommended. A pedestrian linkage to the footpath along the north western edge of the new Myrescroft development should also be incorporated into any proposal. It is also important that there is connectivity from the site to the village centre for both pedestrians and cyclists.</i></p> <p><i>The development at Myrescroft to the north east of this site confirmed that there was a healthy market for house purchasers within Ancrum.</i></p>	
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			<p><i>Consequently this proposal could be considered to be effective and there is an interested developer associated with the site. However care must be taken to ensure any new development does not saturate the village within a relatively short period of time.</i></p> <p><i>Scottish Water has confirmed that there is sufficient capacity. SG assessment raises the possibility that land will be required to safeguard for education provision, implying an education capacity problem.</i></p> <p><i>The site was included within the Main Issues Report as an 'alternative' option for inclusion within the Proposed LDP, given the issue of cumulative impact on the character of the village. Consequently there were not considered to be any insurmountable reasons nor constraints to prevent it being included. However, in deciding which of the many MIR sites were ultimately included within the proposed LDP consideration was given to a range of factors. These included, for example, the housing land requirement based on the proposed SDP2 which was informed by HNDA2, any developer interest in the site, provision of local facilities /</i></p>	
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			<i>services, comparison with other submitted sites. Ultimately it was considered that there were more appropriate sites considered within the MIR to contribute towards the housing land requirement and the site was not included. At this point in time the village should be given time to adapt to the relatively recent large scale development of Myrescroft, however, it is acknowledged that the site could be considered again for inclusion in a future LDP.'</i>	
Darnick	ADARN005 (Land South of Darnlee)	The contributor considers the proposed house numbers to be too high/dense for this 0.8ha site, 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. <b>(60)</b>	Comments noted. The site capacity is an indicative figure at this stage. The number of properties would be properly assessed and determined during the process of any future planning applications for the site. Landscaping would also be considered in more detail at the planning application stage.	No action required.
Darnick	ADARN005 (Land South of Darnlee)	SEPA has advised that the site has water environment considerations. <b>(119)</b>	Comments noted. It is recommended that the following is added as a new bullet point to the site requirements: 'The site has water environment considerations'.	It is recommended that the Council agrees to add the following additional site requirement attached to (ADARN005) to read as follows: 'The site has water environment considerations'.
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	Comments noted. The site capacity is an indicative figure at this stage. The number of properties would be	It is recommended that the Council agrees to allocate

		<p>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? <b>(143)</b></p>	<p>properly assessed and determined during the process of any future planning applications for the site. Landscaping would also be considered in more detail at the planning application stage. It is not within the control of the Council to dictate how the plots are sold/developed. The site is located within the historic battlefield (Inventory Battlefield of Darnick). There is a site requirement which advises any developer of the site that the special qualities and setting of this must be safeguarded and that appropriate mitigation is likely.</p>	<p>this site (ADARN005) within the Proposed Local Development Plan.</p>
Darnick	ADARN005 (Land South of Darnlee)	<p>Melrose and District Community Council support the preferred option of Darnlee in Darnick provided it allows for road and junction improvements in Broomilees. <b>(153)</b></p>	<p>Comments noted. Road improvement works are stipulated as a site requirement for this site.</p>	<p>It is recommended that the Council agrees to allocate this site (ADARN005) within the Proposed Local Development Plan.</p>
Darnick	ADARN005 (Land South of Darnlee)	<p>Contributors do not agree with this proposed site for the following reasons:</p> <ul style="list-style-type: none"> <li>• Setting of the listed building of Darnlee is totally compromised.</li> <li>• Visual amenity and character of the entrance to the village would be severely degraded. The whole character of the area will be changed.</li> <li>• 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</li> </ul>	<p>Comments noted. Each bullet point is responded to as follows:</p> <ul style="list-style-type: none"> <li>• It is considered that the site can be developed sensitively without having a detrimental impact upon the setting of the listed building, Darnlee.</li> <li>• It is acknowledged that the site is prominent within the Conservation village of Darnick. The site is currently private grazing land and does not form any open recreational space. It</li> </ul>	<p>It is recommended that the Council agrees to allocate this site (ADARN005) within the Proposed Local Development Plan.</p>



		<p>Chiefswood Road - houses jammed in 'cheek-by-jowl' and abutting closely on the road adjacent to the site.</p> <ul style="list-style-type: none"> <li>• 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. <b>(153)</b></li> </ul>	<p>is considered that a sensitively designed development would be appropriate at this location without having a detrimental impact upon the character of the village. A Planning Brief would be prepared in order to inform development at this location.</p> <ul style="list-style-type: none"> <li>• The site capacity is an indicative figure at this stage. The number of properties would be properly assessed and determined during the process of any future planning applications for the site.</li> <li>• The Council's Roads Officer has raised no objections to the development of this site in principle. Further discussions in respect of the vehicular access requirements would be required and a Transport Statement would require to be submitted as part of any future planning application.</li> </ul>	
Darnick	ADARN005 (Land south of Darnlee)	<p>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 ancient or veteran character of the trees. Alternatively the site boundary can be reviewed to exclude the area of</p>	<p>Comments noted. It is agreed that a site requirement should be added stating the need for a tree survey to be undertaken to determine the ancient or veteran character of the trees within the site. A site requirement already requires that existing trees are retained and protected, it is considered that this should be amended to read: 'A tree survey to be undertaken of existing trees within the site to determine the ancient or veteran character of the</p>	<p>It is recommended that the existing site requirement stating '<i>Retain and protect the existing boundary features and trees, where possible</i>' should be amended to read: '<i>A tree survey to be undertaken of existing trees within the site to</i></p>

		woodland on the western side. <b>(199)</b>	<i>trees.. Retain and protect the existing boundary features and trees, where possible'</i>	<i>determine the ancient or veteran character of the trees. Retain and protect the existing boundary features and trees, where possible'.</i>
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". <b>(213)</b>	Comments noted. The site requirements for the site stipulate that a Planning Brief will be prepared for this site which will include the principles of 'Designing Streets'. It is considered that a re-wording of the site requirement relating to existing boundary trees is not necessary as this will be explored further as part of a Planning Brief and planning application. It is expected that a tree survey would be required at the planning application stage. The site requirements include the need for a high standard of design in view of the location of the site within the NSA.	It is recommended that the Council agrees to allocate this site (ADARN005) within the Proposed Local Development Plan.
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	Comments noted. The site was identified within the Main Issues Report as a preferred option for development and the site is considered appropriate for	It is recommended that the Council agrees not to allocate this site (ADENH006) within

		<p>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. <b>(119)</b></p>	<p>residential development in principle. However, it must be acknowledged that there has been low take up of development land within the village in recent years, with two sites already allocated within the village (RD4B and ADENH001) with a total indicative capacity of 50 units, which remain undeveloped.</p> <p>In deciding which of the many MIR sites were ultimately included within the Proposed LDP consideration was given to a range of factors. These included, for example, the housing land requirement based on the proposed SDP2 which was informed by HNDA2, any developer interest in the site, provision of local facilities / services, comparison with other submitted sites. Ultimately it was considered that there were more appropriate sites considered within the MIR to contribute towards the housing land requirement and the site was not included. It is acknowledged that the site could be considered again for inclusion in a future LDP.</p> <p>It must be noted, however, that the site in question is located within the settlement boundary and could therefore be developed, through the process of a planning application.</p> <p>Should this site be taken forward a</p>	<p>the Proposed Local Development Plan.</p>
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			<p>site requirement is included which would require that a Flood Risk Assessment is undertaken. Further site requirements could be added requiring that a potential surface water hazard and water environment considerations are taken account of. Furthermore, standard wording is contained within the introductory pages to Volume 2 of the Proposed LDP2 advising of the need for foul water connecting into the Scottish Water foul network. The second site requirement already requires that the existing boundary features are retained, this would include the watercourse, the wording could also require that this is enhanced.</p>	
Denholm	ADENH006 (Land south east of Thorncroft)	<p>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. <b>(224)</b></p>	<p>Comments noted. The site was identified within the Main Issues Report as a preferred option for development and the site is considered appropriate for residential development in principle. However, it must be acknowledged that there has been low take up of development land within the village in recent years, with two sites already allocated within the village (RD4B and ADENH001) with a total indicative capacity of 50 units, which remain undeveloped.</p> <p>In deciding which of the many MIR sites were ultimately included within the Proposed LDP consideration</p>	<p>It is recommended that the Council agrees not to allocate this site (ADENH006) within the Proposed Local Development Plan.</p>

			<p>was given to a range of factors. These included, for example, the housing land requirement based on the proposed SDP2 which was informed by HNDA2, any developer interest in the site, provision of local facilities / services, comparison with other submitted sites. Ultimately it was considered that there were more appropriate sites considered within the MIR to contribute towards the housing land requirement and the site was not included. It is acknowledged that the site could be considered again for inclusion in a future LDP.</p> <p>It must be noted, however, that the site in question is located within the settlement boundary and could therefore be developed, through the process of a planning application.</p>	
Galashiels	(AGALA029) Netherbarns	<p>The contributor, acting on behalf of M&amp;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.</p>	<p>There are a wide range of issues which have been raised regarding the identification of this site (Netherbarns, AGALA029) within the MIR. This response is a generic response to what are considered to be the main points raised.</p> <p><u>Background</u> It is acknowledged that the site has a history and has previously been omitted from the LDP by Reporters from the Scottish Government. However, it is not uncommon for submissions to be made again for</p>	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.

		<p>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 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</p>	<p>sites that have been dismissed previously. What needs to be considered is whether there are any new material considerations and amendments to the proposal which have not previously been tabled which could justify the site being included within the LDP.</p> <p><u>Planning History – Timeline</u></p> <ul style="list-style-type: none"> <li>• A full planning application was submitted under an interim housing policy for the development of 79 dwellinghouses on the site (04/00706/FUL). The application was approved by the Planning Committee. However, ultimately it was refused by Scottish Ministers after they had called it in.</li> <li>• The aforesaid call-in coincided with the process of determining the Local Plan 2008. The site had been identified for housing in both the consultative draft and the finalised version of the Plan. Ultimately the Reporter dismissed the site for the following reason: “Development would be undesirable because of the potential risk of damage to a very important landscape, historic and cultural interests, and to the contribution of tourism to the Borders economy”. Consequently the site was excluded from the adopted Local Plan 2008.</li> <li>• During the processing of the Local Plan Amendment shortly afterwards,</li> </ul>	
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		<p>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"> <li>• 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</li> </ul>	<p>the land owners again submitted the site for inclusion within the Plan proposing some 85 houses. At the time it was considered there were more suitable sites in Galashiels for housing (e.g. Easter Langlee, Coopersknowes, Winston Road) and the Council did not support the proposal. Ultimately the Scottish Government Reporters agreed with the Council's position and rejected the inclusion of the site, also making reference again to the potential impact upon Abbotsford House.</p> <ul style="list-style-type: none"> <li>• The landowner had discussions with Historic Scotland in respect of their concerns regarding the impact development of the site would have on Abbotsford House and its setting. The landowners provided further proposed landscaping and layout plans and as a result of this Historic Scotland withdrew their objection to the development.</li> <li>• In the preparation of the Local Development Plan 2016, a number of housing sites were considered to satisfy an identified need within the Central Borders/Galashiels area. Finding suitable land for housing in Galashiels was problematic given various constraints. In respect of the Netherbarns site it was considered that given Historic Scotland had withdrawn their objection, the landowners had submitted further mitigation details</li> </ul>	
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		<p>negative impacts upon Abbotsford and respond to any perceived shortcomings of the site are evident.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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 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,</li> </ul>	<p>and the site capacity was reduced considerably to 45 units which addressed identified constraints, the site was identified by the Council as a preferred housing site within the Main Issues Report 2012. The site was removed from the Local Development Plan by the Reporter through the Examination, stating the following reasons: "All-in-all, despite the 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. On this basis, I conclude the allocation, including the somewhat obscure reference to educational facilities, should be removed from the proposed plan".</p>	
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		<p>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</p>	<p><u>New site submission</u>  The site was again submitted for inclusion in the Council's Main Issues Report. The new plans took on board the Reporter's reasoning for refusal. The site was identified within the Council's Main Issues Report 2018 as an alternative site for housing for 45 units. Had it not been for the history associated with the site, it is highlighted that Officers would have identified the site as a preferred option.</p> <p>Consideration must be given as to any proposed new mitigation matters which have been submitted as part of the proposal. The developer has submitted a site plan along with a Heritage Statement, Landscape and Visual Assessment and updated Landscape Photography. The plans confirm further screening of the site would be carried out. These proposals also confirm the site will not be visible from Abbotsford House during the Summer months and in the Winter months (when Abbotsford House is closed to the public) photomontages have shown that only fleeting views of very small parts of the site could be seen, but proposed housing would not be located within these visible locations. Development has been shown to be restricted to the</p>	
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		<p>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"> <li>• 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.</li> <li>• 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. <b>(129)</b></li> </ul>	<p>extreme north western and western parts of the site, set between an existing tree belt to the north and south. The large eastern part of the site is not now proposed for development as this is considered to be the part of the site that may be visible, albeit extremely marginally, from Abbotsford House. Furthermore, a Design Code has been submitted which confirms that external materials would be sympathetic in colour with a palette to include earthy shades.</p> <p><u>Contribution to Housing Land Supply</u></p> <p>It is acknowledged that there is a requirement to identify housing land within Galashiels as part of the Railway Blueprint, which seeks to capitalise upon economic opportunities within the Borders Railway corridor. An estimate of the timescale for delivery of housing projects has been continually difficult due to the economic downturn in the housing market and a drop in housing development nationally. The programming of sites within the Housing Land Audit can only be a reasonable expression of what can be developed within the time periods and there is a significant degree of uncertainty beyond years 2 and 3.</p>	
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			<p>It has been increasingly difficult in recent years to identify any additional housing land within Galashiels. The submission confirms that the proposed site is presented by an active local housebuilder who envisages that the site could be delivered within the Plan period.</p> <p>The allocation of this site would contribute to the 5-year effective housing land supply within Galashiels, which at the moment is heavily reliant on the development of one site at Easter Langlee. The allocation of this site would provide additional choice within the Galashiels housing market area. It would also meet the requirements set out within the Borders Railway Blueprint and would contribute towards the wider regeneration of the town.</p> <p><u>Main Issues Report - Representations</u> Moving on to specific points of objection, the following responses are provided:</p> <p><u>Impacts upon Category A Listed Abbotsford House</u> The existing residential development of Netherbank, which is in an elevated position to the north of the Netherbarns site, across</p>	
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			<p>the A7, can already be viewed from Abbotsford House. Likewise, existing houses to the south of Abbotsview Drive, which adjoin the site, are visible. The Council is unaware of any evidence at all that views of these properties have had any adverse impact whatsoever on any tourism matters related to the House. In light of this, it is not considered that the proposed new amended site layout, set behind well-established and new proposed woodland, would prevent visitors from coming to Abbotsford.</p> <p>The house builder has confirmed that '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'. Officers remain of the strong opinion that when viewing the parts of the site now proposed for development from Abbotsford House and its gardens, the site is extremely well screened by mature trees during the Summer months when the house is open to the public. The House is closed from November to March and during these Winter months, when</p>	
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			<p>trees lose their foliage, there is still strong screening. The house builder has confirmed that further planting would alleviate any fleeting glimpses into the site. Elected Members visited the site to view the plans proposed, the site characteristics and significantly any impacts from Abbotsford House and its grounds. Members will have formed their opinions how significant, or otherwise, any impacts might be and will take this on board in deciding whether or not the site should be included within the Proposed LDP.</p> <p>As part of the MIR consultation, Historic Environment Scotland (HES) has raised no objections to the principle of development at this location on the basis that a masterplan will be prepared which will ensure that the detail of scale and detailed views analysis, amongst other matters, can be considered.</p> <p><u>Impacts on the Designed Landscape</u></p> <p>The site is located outwith the Abbotsford Inventory Garden and Designed Landscape and is clearly separated from it by existing trees. There are a significant number of long established properties within Kingsknowes/Tweedbank located</p>	
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			<p>close to and in clear view of the boundary of the Garden and Designed Landscape and it is not considered that they have a detrimental impact upon it. The site is extremely well screened around the perimeter and has other existing and proposed trees within the site which would further screen it from the Designed Landscape.</p> <p><u>Light/Sound/Visual Intrusion and Amenity Issues</u></p> <p>In recent times Abbotsford has expanded with a new visitor centre and hold weddings within the grounds. The Council is not aware that this has caused disruption to Abbotsford House. It is not considered that the development of the Netherbarns site would compromise users or visitors to Abbotsford given the considerable distance and screening between them. It is not considered that residential properties at this location would result in a loss of amenity at Abbotsford House. There are already existing residencies in proximity to the Netherbarns site and the Council is unaware of any issues these cause in respect of having a detrimental impact on Abbotsford House and any visitors to it.</p> <p><u>Clearance of TPOd trees</u></p>	
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			<p>Officers are aware that Abbotsford House wish to undertake some maintenance work on trees on the north side of the River Tweed located between the site and Abbotsford House. These trees are prominent and are protected by a Tree Preservation Order. Any works to these mature trees would require the consent of the Council. This has not been applied for and would have to be considered very carefully by the Council. Whilst some maintenance work could be agreed, the removal of these mature and prominent trees would be a major issue. There are other trees outwith the ownership of Abbotsford House which offer significant screening as well as extra planting proposed within the development site by the developers.</p> <p><u>Impacts on tourism</u> It is not considered that development on the opposite side of the River Tweed, which is substantially screened by existing woodland, would deter visitors from Abbotsford House. Concerns have been raised regarding the impact upon the Woodland Management and new path network on the Abbotsford Trust land. Throughout the Scottish Borders there are numerous woodland management schemes/woodland walks but none</p>	
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			<p>of this work should in any way be considered to prevent opportunities for development in the vicinity. It is not considered the Netherbarns development, as now proposed, will have any bearing at all in terms of public usage and enjoyment of the Trust land path network.</p> <p><u>Countryside Around Towns Policy</u> The site is located within the Countryside Around Towns area as defined by Policy EP6 which in essence seeks to prevent coalescence between existing settlements. It is not however considered that the development of this site would have an unacceptable harm on the settlements due to the location of the site adjacent to existing developments and being within a natural setting amongst well-established perimeter planting. The policy does not prevent the consideration of the allocation of new sites within the LDP if considered necessary and appropriate.</p> <p><u>Public Consultation</u> In advance of the publication of the Main Issues Report (MIR), the Council held a number of Pre-MIR consultation events. During the event at the Galashiels Transport Interchange, on 27 September</p>	
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			<p>2017, there was discussion on the possibility of the Netherbarns site being released for housing. It was generally agreed that it is a suitable and desirable location for housing in Galashiels, this is confirmed in the meeting minutes.</p> <p><u>Conclusions</u> Finding new sites for development in the Galashiels area is extremely challenging, largely due to topography, road infrastructure and flooding issues. Solely because a site has previously been refused planning consent or has been rejected for inclusion within an LDP are not reasons for again automatically opposing such amended proposals. What is important is that the amended proposals are fully scrutinised and critically, in this instance, are viewed from Abbotsford House and the land in front of it. It is insufficient just to say Abbotsford House is a sensitive building and therefore no other buildings in the wider area should be permitted. When the plans are viewed from Abbotsford, it is clear in when the House is open to the public that the proposed location of the houses will not be seen, indeed it is extremely difficult to even gauge their positions from the House given the extreme foliage.</p>	
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			<p>Officers remain of the strong opinion that given the new proposals, this site is extremely well-screened from a wide range of viewpoints and is a natural extension of the Galashiels settlement boundary which has a very strong boundary tree belt. It is important to note that at the closest point the new plans confirm a distance of at least 370m between development and Abbotsford House. This is a considerable and significant distance. Any impacts on Abbotsford House and the Designed Landscape will be extremely minimal, significantly less than any impacts existing buildings have.</p> <p>The submission has been made by a well-known and reputable local building firm and strong weight should be given to the fact that this is an effective site within an area where finding effective sites is extremely difficult. The builders have confirmed that works would commence within 24 months of allocation. It is considered that there are many buildings which immediately adjoin or are clearly visible from the Designed Garden. It is considered the proposed location of the houses on the Netherbarns site will have significantly less impact, if any impact at all on the Designed Landscape. It is should be noted</p>	
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			<p>that the modern visitor centre at Abbotsford has been built within the Designed Landscape.</p> <p>Existing residential properties at Netherbank and the southern part of Abbotsview Drive are visible with fleeting glimpses from Abbotsford House. There is no doubt one of the reasons these houses can be viewed in the winter time is due to their light external finishes which make such properties more prominent. The Council is unaware there is any evidence at all that any existing houses which can be viewed from the House have had any adverse impacts at all to visitors to the House. Taking all matters into consideration, it is considered that views from the House to the new proposed houses will be negligible and there are no grounds to oppose the site being included within the Proposed LDP.</p>	
Galashiels	(AGALA029) Netherbarns	<p>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 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</p>	See above.	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.

		<p>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"><li>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 landscape is contiguous with the development site.</li><li>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.</li><li>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.</li><li>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.</li><li>5. The proposal is for 45 houses to be placed on</li></ol>		
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		<p>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> <p><u>A. Screening of the site by trees</u> 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 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</p>		
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		<p>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"><li>• They are too linear, too narrow, with too many straight lines.</li><li>• They contain an inappropriate mix of trees for the character of the setting.</li><li>• They are inappropriate to Scott's woodland compartments which have sinuous outlines, cover 50% of the ground, and are almost wholly deciduous.</li><li>• 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.</li><li>• At worst they will fail to establish and have no role in screening parts of the new development.</li><li>• Strips of trees, or even small clumps, cannot be managed over time for continuous cover woodland.</li></ul> <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</p>		
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		<p>Trust is not active in winter so the lack of a screen in winter does not matter:</p> <ul style="list-style-type: none"><li>• 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</li><li>• The designed landscape at Abbotsford is open to the public 24/7</li><li>• 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?</li><li>• 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 House.</li></ul> <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> There has been a material change at Abbotsford since the Netherbarns site was dismissed from the</p>		
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		<p>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"><li>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.</li></ol>		
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		<ol style="list-style-type: none"> <li>2. Scott designed Abbotsford as a wrap around, immersive, world-within-a-world which displays all the core tenets of the Romantic movement.</li> <li>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.</li> <li>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.</li> <li>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 ‘elasticity’ of mind essential for his creativity.</li> </ol> <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</p>		
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		<p>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</p>		
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		<p>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> <ul style="list-style-type: none"><li>• Each house will be partially visible from Abbotsford because of this slope.</li><li>• 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.</li><li>• The rest of the development will have the effect of bearing down on the historic setting.</li><li>• 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.</li><li>• 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</li></ul>		
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		<p>be increased by new extensions, conservatories, greenhouses and solar panels and parked cars.</p> <ul style="list-style-type: none"><li>• 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.</li><li>• 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.</li></ul> <p>Furthermore, these intrusions will adversely affect Abbotsford in the following ways:</p> <ol style="list-style-type: none"><li>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.</li><li>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.</li><li>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.</li></ol>		
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		<p>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.</p> <p>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.</p> <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 250<sup>th</sup> anniversary and with the eyes of the nation upon us, diggers were to greet visitors across the Tweed. <b>(310)</b></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</p>	See above.	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.

		<p>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</p>		
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		<p>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 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</p>		
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		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. <b>(313)</b>		
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"> <li>• 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. <b>(39)</b></li> <li>• Over the past year the contributor has contributed to a new development at</li> </ul>	See above.	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.



		<p>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 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. <b>(39)</b></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 –</p>		
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		<p>housing development at Netherbarns would be highly detrimental. <b>(39)</b></p> <p>Oppose any development at this location, it would seriously impact upon Abbotsford – one of the major tourist attractions in the Borders. <b>(58)</b></p> <p>Contributor is strongly opposed to this site for the following reasons:</p> <ul style="list-style-type: none"><li>• 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. <b>(60, 120, 121)</b></li><li>• 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. <b>(60, 68, 120, 121)</b></li><li>• 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. <b>(60, 120, 121)</b></li><li>• 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</li></ul>		
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		<p>water valley of the town. <b>(60, 120, 121)</b></p> <ul style="list-style-type: none"><li>• 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. <b>(60, 120, 121)</b></li><li>• The contributor believes that the conclusions of the last public inquiry remain definitive: “Despite the 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.” <b>(60, 120, 121)</b></li><li>• 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</li></ul>		
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		<p>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. <b>(60)</b></p> <ul style="list-style-type: none"><li>• Development on the site would be contrary to:</li></ul> <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'. <b>(68)</b></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</p>		
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		<p>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'. <b>(68)</b></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 an unacceptable adverse impact on the landscape features, character or setting of 1. Sites listed in the Inventory of Gardens and Designed Landscapes.'<b>(68)</b></p> <ul style="list-style-type: none"><li>• 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.' <b>(68)</b></li><li>• 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</li></ul>		
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		<p>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. <b>(68)</b></p>		
Galashiels	AGALA029 (Netherbarns)	<p>Contributor objects strongly to the proposed allocation (alternative). This is an area in full view of Abbotsford, the Eildon &amp; 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. <b>(47, 54, 66)</b></p>	See above.	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.
Galashiels	AGALA029 (Netherbarns)	<p>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</p>	See above.	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.

		<p>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. <b>(78)</b></p>		
Galashiels	AGALA029 (Netherbarns)	<p>Object to the proposed allocation on the following grounds:</p> <ul style="list-style-type: none"> <li>• Abbotsford is an internationally important tourist attraction.</li> <li>• The integrity of the setting of Abbotsford would be compromised by a view of houses.</li> <li>• There would be a risk to tourism if this were to happen.</li> <li>• Abbotsford's fundraising abilities - to conserve Scott's legacy - would be undermined.</li> <li>• If tourism were affected, there would be a knock-on effect on jobs.</li> <li>• Abbotsford's aspirations to be recognised as a World Heritage Site would be weakened.</li> <li>• Alternative sites with less detrimental immediate environment impact should be considered. <b>(84)</b></li> </ul>	See above.	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.
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? To propose to build that amount of houses and a</p>	See above.	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.

		<p>school next to "The Tweed Conservation Area" and overlooking Abbotsford, the number one tourist attraction in the Borders does not seem right.</p> <p>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.</p> <p>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.</p> <p>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</p>		
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		about the urbanisation of our wonderful Borderlands. <b>(85)</b>		
Galashiels	AGALA029 (Netherbarns)	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. <b>(119)</b>	See above.	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.
Galashiels	AGALA029 (Netherbarns)	The contributor fully supports opposition and the previous public enquiry conclusion (Richard Dent 2015) 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. <b>(135)</b>	See above.	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.
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. <b>(148)</b>	See above.	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.
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	See above.	It is recommended that the Council agrees to allocate this site

		<p>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</p>		<p>(AGALA029) within the Proposed Local Development Plan.</p>
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		<p>this site should be placed on this site. <b>(153)</b></p>		
Galashiels	AGALA029 (Netherbarns)	<p>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 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</p>	See above.	<p>It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.</p>

		shortage. <b>(163)</b>		
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. <b>(164)</b>	See above.	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.
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	See above.	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.

		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. <b>(187)</b>		
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. <b>(196)</b>	See above.	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.
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. <b>(206)</b>	See above.	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.
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. <b>(213)</b>	See above.	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.

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. <b>(228)</b>	See above.	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.
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. <b>(305)</b>	See above.	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.
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	See above.	It is recommended that the Council agrees to allocate this site (AGALA029) within the Proposed Local Development Plan.

		<p>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.</p> <p>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.</p> <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>		
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		<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. <b>(143)</b></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"> <li>• The presence of significant electricity and gas transmission plant;</li> <li>• The traffic capacity of the existing Langshaw Road (C77);</li> <li>• Potential noise from waste transfer/aggregate crushing and sorting</li> </ul>	<p>The site (AGALA038) was previously considered at the 'Pre MIR' stage and was not included within the MIR. The site assessment concluded the following:</p> <p><i>'This site is located outwith the settlement boundary and is separated from nearby housing by a mature shelter belt. The site is constrained by the detachment from Galashiels, compounded by distance from the town centre and the barrier created by the 'lip' of land which separates the area from the</i></p>	<p>It is recommended that the Council agrees not to allocate this site (AGALA038) within the Proposed Local Development Plan.</p>



		<p>plant; and</p> <ul style="list-style-type: none"> <li>• Potential smell and gas ingress from former landfill.</li> </ul> <p>The site has some very distinct advantages; namely;</p> <ul style="list-style-type: none"> <li>• It is available now;</li> <li>• It is a well contained site due to topography and vegetation;</li> <li>• It is low value agricultural land;</li> <li>• It has no outstanding landscape or recreational value;</li> <li>• It is close to the settlement boundary with existing access and achievable new access links; and</li> <li>• It is a large site capable of contributing significantly to fulfilling the authorities' housing requirements.</li> </ul> <p>All of the concerns expressed in the Main Issues Report for AGALA038 can be overcome, or in some 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.</p>	<p><i>Tweed Valley. The site has good access to services and facilities and is served by an acceptable level of public transport including the proposed Borders Railway. The potential impact on biodiversity is minor. The section of the Langshaw road adjacent to the site will require upgrading, in terms of carriageway widening and extending the footway and lighting infrastructure out from the town, and the northern part of the road may require realignment in order to facilitate safe access to it. A major hazard pipeline runs through the site and the Easter Langlee landfill site is located immediately to the east of the site. It is considered that other, more appropriate sites are available within the housing market area to meet the shortfall. This site would not represent a logical extension of the built up area as it would extend the settlement beyond an existing mature shelter belt to the north of Coopersknowe. This would prejudice the character and natural built up edge of the settlement to the detriment of the landscape setting. Furthermore, the proximity of the site to the existing landfill site would be contrary to prevailing national policy leading to unacceptable adverse impacts on the residential amenity of the proposed dwellings as result of noise and odour nuisance from the</i></p>	
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		<p>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. <b>(24)</b></p>	<p><i>adjacent landfill site.</i></p> <p><i>The southern part of this site was considered for housing as part of the Local Development Plan Examination (LDP 2016), the Reporter made the following comments in relation to housing site (AGALA030): "Approaching the site from the north, the land to the west of the road has a pleasant countryside appearance and the crest of the hill provides a distinct entrance to Galashiels. The construction of the houses, as proposed, would have a marked visual impact and severely detract from the local importance of this land within the landscape setting of the town. Whilst the proposed community allotments would be unlikely to have a significant impact, the construction of even a small number of houses at this location would not be acceptable in either visual or landscape character terms. Irrespective of the location of the site within the landscape, the proximity of the Easter Langlee landfill operation is a practical concern. The distance between the proposed residential development and the landfill site would be less than 100 metres. Noting the guidance in Scottish Planning Policy I agree with the council that this would not be acceptable".</i></p>	
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			<p>Since the aforesaid proposals were considered, it is now established that the landfill site will be capped in the near future. Despite this, the Waste Manager of SBC would remain concerned by any proposed housing within close proximity of the landfill site due to potential leakage. The additional overriding issue with any development of this site is that Langshaw Road would require significant upgrading involving land outwith the control of the applicant.</p> <p>For the aforesaid reasons, the site should not be included within the Proposed LDP for housing.</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. <b>(294)</b></p>	<p>The site assessment concluded the following:</p> <p>There are a number of constraints identified with the development of this site, which are highlighted below:</p> <ul style="list-style-type: none"> <li>• There is high impact biodiversity risk associated with the site given the mature broad-leaved woodland part of which is Ancient woodland.</li> <li>• The site is encroaches into mature woodland. The existing mature woodland acts as a mature and well established boundary to the settlement at this location. The removal of mature</li> </ul>	<p>It is recommended that the Council agrees not to allocate this site (AGALA038) within the Proposed Local Development Plan.</p>

			<p>trees in order to facilitate development is not encouraged.</p> <ul style="list-style-type: none"> <li>• Wood Street is characterised by properties extending along the street frontage. Any development at this location would constitute backland development, out of character with adjacent properties.</li> <li>• The Roads Officer objects to the proposal. The site is unacceptable for reasons of topography, interference with multi-use path, insufficient visibility at access, little integration with street.</li> </ul> <p>For the aforesaid reasons, it is not considered that this site is suitable for housing development.</p>	
Galashiels	BGALA006 (Land at Winston Road I)	<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"> <li>• It is deliverable within the Local Plan lifespan. The developer owns the land and has the finances and 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.</li> <li>• 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.</li> </ul>	<p>The site (AGALA039) was previously considered at the 'Pre MIR' stage and was not included within the MIR for residential development but for business and industrial land. The site assessment for residential development at this location concluded the following:</p> <p><i>'The location of the site is acceptable in principle for residential development. However, a key issue is potential conflict with adjacent uses. These include the substation site (noise, vibration, overhead lines), sewage works (odours),</i></p>	<p>It is recommended that the Council agrees not to allocate this site (BGALA006) for residential development within the Proposed Local Development Plan. It is recommended that the Council agrees to allocate this site for business and industrial land.</p>

		<ul style="list-style-type: none"> <li>• It is in a sustainable location: highly accessible to Galashiels town centre, bus services and Tweedbank Train Station.</li> <li>• 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.</li> <li>• It has very easy access to utilities/ infrastructure.</li> <li>• The site is not at risk of flooding from the River Tweed.</li> <li>• Affordable housing will be provided on part if not all of the site in accordance with Policy HD1.</li> <li>• There are no issues with access to the site.</li> <li>• The site is considered acceptable in principle for residential development.</li> </ul> <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. <b>(131)</b></p>	<p><i>railway line (noise/vibration) and an exclusion zone with gas pipeline running within the eastern boundary of the site. A Flood Risk Assessment would be required by SEPA. There is moderate biodiversity risk. Assessment and mitigation of impact on SAC required. Capacity of the site would depend upon the wayleaves required for OH powerlines and this may take out parts of the site. Environmentally there are few limits although existing trees within the site on the south and near eastern side should be retained to provide setting and minimise impacts on River Tweed adjoining. A Transport Assessment would be required. Contamination would require to be investigated and mitigated. It is considered that for the aforesaid conflicts, this is not a desirable location for residential development.'</i></p> <p>For the aforesaid reasons, the site should not be included within the Proposed LDP for housing. The site is, however, considered to be appropriate for business and industrial development.</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	Disagree. Whilst finding land in the railway corridor is challenging, the Proposed LDP takes forward a number of allocated sites around the town including recent new	No action required.

		before locating the railway in Galashiels? <b>(80, 233, 271, 227)</b>	allocations for housing/business at Lowood and housing at Netherbarns.	
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"> <li>• Ensuring sufficient new housing land is available allowing for a phased approach to the release of housing land;</li> <li>• Meeting the economic prosperity and environmental quality strategic objectives;</li> <li>• Locating development which minimises the number and length of car journeys by providing new homes adjacent to a transport corridor;</li> <li>• The contribution to the strategy and policies of the Development Plan and other national and local policy objectives;</li> <li>• 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;</li> <li>• The provision of choice across the housing market area;</li> <li>• The design, quality and density of development that can be achieved;</li> <li>• The proposal will not have a significant adverse effect on any natural or built heritage interests or any national or international environmental designations;</li> <li>• The proposal can support the existing services in the village;</li> <li>• The proposals can contribute to the facilitation of improved facilities in the village</li> </ul>	<p>The site (AGATT013) was previously considered at the 'Pre MIR' stage and was not included within the MIR. The site assessment concluded the following:</p> <p><i>'The site was identified as constrained in the Development and Landscape Capacity Study for the following reasons: development across the undulating slopes is constrained by the more complex topography and often steep slopes which would require earthworks; the area is highly open and relatively exposed because of the broadly convex curvature of the hill flank; the slopes are very visible, particularly from the south and the Eildon Hills, from where they contribute to the scenic quality of the National Scenic Area; the fields are a valuable agricultural resource. There are also considerable access issues to be addressed and resolved.</i></p> <p><i>It should also be noted that this site formed part of the 2006 Local Plan Inquiry and the Local Development Plan 2016 Examination for 150 units. The Reporter of the LDP Examination agreed with the</i></p>	It is recommended that the Council agrees not to allocate this site (AGATT013) within the Proposed Local Development Plan.

		<p>and in neighbouring villages; and</p> <ul style="list-style-type: none"> <li>• There are no other significant environmental dis-benefits or risks, for example flooding.</li> </ul> <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. <b>(176)</b></p>	<p><i>findings of the previous Reporter who noted that, "in view of its elevated position and slope, development would be prominent when viewed from the immediate vicinity and in more distant views from the south, including the Eildon Hills. Development of this greenfield site would also have an adverse effect on the rural setting of this part of Gattonside. I am not satisfied that development at a low density would satisfactorily resolve those matters. That is a consideration to which I must attach great weight given the likely impact on the Eildon and Leaderfoot National Scenic Area". This position remains unchanged and therefore it is not considered appropriate to allocate this site for housing.</i></p> <p><i>The site is located within the CAT policy area which aims to ensure the high quality living environment is protected and to prevent piecemeal development, which would detract from the area's environment. The scale of the development within this elevated and prominent position would not adhere to the requirements of the CAT policy.</i></p> <p><i>The issues raised by the Council's Roads Planning Team appear to be insurmountable given the land requirements are outwith the</i></p>	
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			<p><i>ownership of the applicant.'</i></p> <p>For the aforesaid reasons, the site should not be included within the Proposed LDP for residential development.</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 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</p>	<p>The settlement boundary amendment assessment concluded the following:</p> <p>The proposed development boundary amendment was submitted as part of the MIR Consultation stage. The site forms part of the garden ground associated with Fauhope House, which lies to the east of the site. The land owner indicates within their submission that the site would lend itself to the development of a single house. Goatbrae Plantation lies to the north and there is extensive tree planting to the north east of this site, which forms a backdrop to the existing recent housing at Monkswood.</p> <p>An amendment to the village Development Boundary to the west of SBGAT002 was considered for the LDP 2016 (SBGAT001). This was considered to be a natural infill of the then existing Development Boundary between allocated housing land and a tree belt on the eastern side. It was considered the previous amendment in the LDP</p>	It is recommended that the Council agrees not to amend the settlement boundary of Gattonside at this location within the Proposed Local Development Plan.



		<p>(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.</p> <p><b>(316)</b></p>	<p>2016 was an appropriate edge to this part of Gattonside.</p> <p>This proposed amendment to the development boundary would effectively break into the existing garden ground association with Fauhope House, leaving the existing house outwith the development boundary and part of the garden ground within the development boundary. The amendment would extend the existing settlement boundary beyond existing mature trees which currently form an appropriate edge to the village. The current development boundary follows the line of the garden ground and is considered to reflect the existing development line. There are a number of constraints, which are outlined below;</p> <ul style="list-style-type: none"> <li>- Site is located within MOD safeguarded area;</li> <li>- Moderate biodiversity risk, given the broad leaved woodland;</li> <li>- Potential for bat roosts, badger and breeding birds;</li> <li>- Compensatory planting would be required for the loss of any trees;</li> <li>- Located within the CAT policy area;</li> <li>- Site is located within the National Scenic Area, 'Eildon and Leaderfoot'; and</li> <li>- Site must allow links from houses</li> </ul>	
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			<p>to the south and west of the site, to the path network on the east of the site.</p> <p>Although the proposal is for a development boundary amendment, the site is currently garden ground associated with Fauhope House, therefore this would allow proposals to essentially be assessed against the infill policy (Policy PMD5: Infill Development). The land owner has made it clear within their submission that the intention is for a single house within this site. It is not considered appropriate to expand a development boundary merely in order to provide infill opportunities within the settlement itself, without a formal allocation. Furthermore, it is not the purpose of the Local Development Plan to identify and allocate single plots for development, only sites with a capacity of five or more units will be allocated.</p> <p>It is not considered that there is any reasoning why part of the garden ground associated with Fauhope House should be included within the development boundary, other than the fact that it would allow the site to be assessed against Policy PMD5 for a single house.</p> <p>In conclusion, taking the above into</p>	
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			consideration, the development boundary amendment will not be included within the Proposed Plan.	
Hawick	AHAWI027 (Burnfoot Phase 1)	SEPA note that there appears to be a marsh/wetland at the southern end of the site which should be 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. <b>(119)</b>	<p>The site (AHAWI027) was previously considered at the 'Pre MIR' stage and was included within the MIR. The site assessment concluded the following:</p> <p><i>'This site is currently identified as having longer term housing potential in the LDP. Although the site sits outwith the Hawick LDP boundary it is effectively encircled by the town on all sides, including to the north-east of the site, which is allocated for employment use.</i></p> <p><i>The site's relationship with Hawick is acceptable, but careful consideration of the NE boundary and connectivity and boundary treatment between the sites is required. Accessibility within the town, and to neighbouring towns is good.</i></p> <p><i>In landscape terms, the site is acceptable but not all will be developable. Protection of views and attention to the site's boundary to the NE will be required. Up to half the site could need to be given over to landscaping or SUDS, or lost due to being steeply sloping ground on the periphery of the site. Although the LDP longer term site</i></p>	It is recommended that the Council agrees to allocate this site (AHAWI027) within the Proposed Local Development Plan and agrees to incorporate the site requirements highlighted by SEPA.

			<p><i>has a capacity of 100 units this does not account for these constraints. In practice the site capacity is around 60 units.</i></p> <p><i>A Flood Risk Assessment is required in order to assess the risk from a watercourse which is understood to run through the site and may be culverted.</i></p> <p><i>Consideration should be given to the potential for surface water runoff in the south of the site, as per SEPA's 1 in 200 year surface water flood risk mapping.</i></p> <p><i>There are no significant biodiversity issues, but mitigation for protected species would be required and may be necessary. There is potential for on-site play provision. Archaeology evaluation/mitigation required.</i></p> <p><i>In summary, there are no constraints to development and the site should be included within the MIR.'</i></p> <p>It is recommended that the Council agrees to allocate this site within the Proposed Local Development Plan. The comments made by SEPA in respect of the need for a Flood Risk Assessment and potential issues relating to surface water hazard and water environment considerations have been added as site</p>	
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Hawick	AHAWI027 (Burnfoot Phase 1)	<p>The contributor does not agree with this preferred option for the following reasons:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• It is part of an existing wetland. Removal of this wetland would be contrary to the current sustainability of protecting the natural environment.</li> <li>• 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.</li> <li>• Removal of this land would potentially destroy this historic family home.</li> <li>• This is Prime arable ground which should be preserved for food production and biodiversity. <b>(212)</b></li> </ul>	<p>requirements.</p> <p>The site (AHAWI027) was previously considered at the 'Pre MIR' stage and was included within the MIR. The site assessment concluded the following:</p> <p><i>'This site is currently identified as having longer term housing potential in the LDP. Although the site sits outwith the Hawick LDP boundary it is effectively encircled by the town on all sides, including to the north-east of the site, which is allocated for employment use.</i></p> <p><i>The site's relationship with Hawick is acceptable, but careful consideration of the NE boundary and connectivity and boundary treatment between the sites is required. Accessibility within the town, and to neighbouring towns is good.</i></p> <p><i>In landscape terms, the site is acceptable but not all will be developable. Protection of views and attention to the site's boundary to the NE will be required. Up to half the site could need to be given over to landscaping or SUDS, or lost due to being steeply sloping ground on the periphery of the site. Although the LDP longer term site has a capacity of 100 units this does not account for these constraints. In</i></p>	<p>It is recommended that the Council agrees to allocate this site (AHAWI027) within the Proposed Local Development Plan.</p>
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			<p><i>practice the site capacity is around 60 units.</i></p> <p><i>A Flood Risk Assessment is required in order to assess the risk from a watercourse which is understood to run through the site and may be culverted. Consideration should be given to the potential for surface water runoff in the south of the site, as per SEPA's 1 in 200 year surface water flood risk mapping.</i></p> <p><i>There are no significant biodiversity issues, but mitigation for protected species would be required and may be necessary. There is potential for on-site play provision. Archaeology evaluation/mitigation required.</i></p> <p><i>In summary, there are no constraints to development and the site should be included within the MIR.'</i></p> <p>The following responses are made to the contributor's concerns:</p> <ul style="list-style-type: none"><li>• A Planning Brief would be prepared which would inform the design and siting of dwellinghouses at this location.</li><li>• The Council is aware of the existing wetland and this has been considered through the assessment of the site.</li></ul>	
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			<ul style="list-style-type: none"> <li>• Comments noted.</li> <li>• Comments noted.</li> <li>• This sites is an extremely small element of agricultural land across the Scottish Borders and is considered to offer an appropriate location for development given its proximity to existing development within the area.</li> </ul> <p>It is recommended that the Council agrees to allocate this site within the Proposed Local Development Plan.</p>	
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. <b>(196)</b>	Comments noted. The Council's Ecology Officer, Scottish Natural Heritage and the Scottish Environment Protection Agency have been consulted and have raised no objections to the development of this site in principle. The site is considered to have low impact risk upon biodiversity. A site requirement notes the need to enhance the biodiversity value of the site through the creation of restoration of habitats and wildlife corridors and should take cognisance of the sloping nature of the site. Furthermore, an assessment of ecology impacts and the provision of mitigation would be required, as appropriate.	It is recommended that the Council agrees to allocate this site (AHAWI027) within the Proposed Local Development Plan.
Hawick	AHAWI027 (Burnfoot – Phase 1)	SNH welcome the intention to prepare a site development brief for this proposed allocation. As recommended for BHAWI004, SNH consider that	Comments noted. It might be that the Planning Briefs for both sites can be prepared in tandem, taking	It is recommended that the Council agrees to allocate

		<p>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"> <li>• Green infrastructure connections through the site, including links to housing at Burnfoot and the existing path network to the east of Burnhead Road.</li> <li>• Establish SUDS as part of green network in south-western corner of the site.</li> <li>• Close attention should be paid to the existing settlement edge and to maintaining key views from the A7 and the B6359. <b>(213)</b></li> </ul>	<p>account of the settlement edge and key views at this location.</p>	<p>this site (AHAWI027) within the Proposed Local Development Plan.</p>
Hawick	AHAWI027 (Burnfoot – Phase 1)	<p>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. <b>(305)</b></p>	<p>Comments noted. The site assessment concluded the following in respect of landscape/visual impact:</p> <p><i>‘The site’s relationship with Hawick is acceptable, but careful consideration of that NE boundary and connectivity and boundary treatment between the sites is required. Accessibility within the town, and to neighbouring towns is good.</i></p> <p><i>In landscape terms, the site is acceptable but not all will be developable. Protection of views and attention to the site’s boundary to the NE will be required. Up to half the site could need to be given</i></p>	<p>It is recommended that the Council agrees to allocate this site (AHAWI027) within the Proposed Local Development Plan.</p>



			<p><i>over to landscaping or SUDS, or lost due to being steeply sloping ground on the periphery of the site. Although the LDP longer term site has a capacity of 100 units this does not account for these constraints. In practice the site capacity is around 60 units.'</i></p>	
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"> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> </ul>	<p>The site (AMELR008) was previously considered at the 'Pre MIR' stage and was not included within the MIR. The site assessment concluded the following:</p> <p><i>'This site was the subject of an objection at the 2006 Local Plan Inquiry and was considered as part of the Local Plan Amendment process. The site is identified as constrained within the Landscape Capacity Study (March 2007). The Reporters assessment at the Inquiry was that the site should not be developed because it would have an adverse impact on the National Scenic Area. This site is unacceptable because the site would have an adverse impact on the landscape of the National Scenic Area and the setting of the settlement.</i></p> <p><i>The site is located within the CAT policy area which aims to ensure the high quality living environment is protected and to prevent piecemeal</i></p>	<p>It is recommended that the Council agrees not to allocate this site (AMELR008) within the Proposed Local Development Plan.</p>

		<p>landscape and would not be readily visible from Dingleton Road. The site is not dissimilar to The Croft site.</p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p>It is therefore submitted that the site should be allocated for residential development within the forthcoming Scottish Borders LDP2. <b>(177)</b></p>	<p><i>development, which would detract from the area's environment. The scale of the development at this location would not adhere to the requirements of the CAT policy.'</i></p> <p>It is recommended that the Council agrees not to allocate this site within the Proposed Local Development Plan.</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"> <li>It is deliverable in full within the Local Development Plan lifespan.</li> <li>It is not within an area of Flood Risk.</li> <li>It is in a sustainable location highly accessible to Melrose town centre, bus services and Tweedbank Train Station.</li> <li>It is next to current built form and thus easy access to utilities/infrastructure and a natural low lying extension.</li> <li>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.</li> <li>It will not have a significant visual impact due to its low lying nature and neighbouring built form sitting at a higher level.</li> <li>There is no allocation within this area of Melrose despite it being in high demand for new homes.</li> </ul> <p>The contributor stresses the importance of allocating housing in the Scottish Borders where there is a strong demand to live and notes there is</p>	<p>The site (AMELR012) was previously considered at the 'Pre MIR' stage and was not included within the MIR. The site assessment concluded the following:</p> <p><i>'The site is located within one of the most sensitive parts of the CAT policy area, where coalescence between Darnick and Melrose is of key concern. The proposal cannot be considered further due to the unacceptable harm to the distinct identities of these settlements the proposed development would result in. Furthermore, development at this location would have a detrimental impact upon the setting and sense of arrival to Melrose; an unacceptable impact upon the Eildon and Leaderfoot National Scenic Area; a detrimental impact upon the character of the Melrose Conservation Area; and a potential adverse impact upon the special</i></p>	<p>It is recommended that the Council agrees not to allocate this site (AMELR012) within the Proposed Local Development Plan.</p>

		a clear demand for homes in Melrose. <b>(130)</b>	<p><i>qualities of the Eildon &amp; Leaderfoot Hills NSA. In summary, it is not considered that this site is acceptable for development.'</i></p> <p>It is recommended that the Council agrees not to allocate this site within the Proposed Local Development Plan.</p>	
Melrose	AMELR013 (Harmony Hall Gardens)	<p>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. <b>(60)</b></p>	<p>The site (AMELR013) was identified within the Main Issues Report as an 'alternative' option. The site assessment concluded the following:</p> <p>There are clearly sensitive issues which require to be addressed such as the location of the site within the Conservation Area and its proximity to listed buildings. The eastern third of the site is within the Melrose Abbey Scheduled Monument Area and would be excluded from development. Furthermore, archaeological remains are likely within the remainder of the site which would require investigation. It is likely an acceptable access on the western part of the site could be formed with minimal disturbance to the existing walls. It is considered that the development of this sensitive site would be acceptable in principle subject to the following:</p> <ul style="list-style-type: none"> <li>• A Flood Risk Assessment is required which should take</li> </ul>	<p>It is recommended that the Council agrees to allocate this site (AMELR013) within the Proposed Local Development Plan.</p>

			<p>cognisance of a mill lade which previously flowed along the northern boundary and the River Tweed.</p> <ul style="list-style-type: none"><li>• Retain and protect the existing boundary features and trees, where possible</li><li>• Assessment of ecology impacts and provision of mitigation, as appropriate</li><li>• Mitigation required to ensure no significant adverse effects upon integrity of River Tweed Special Area of Conservation</li><li>• Archaeological assessment (including archaeological evaluation) is required, with any associated mitigation as identified</li><li>• Development must respect the setting of the Scheduled Monument. No development within the Melrose Abbey Scheduled Monument (SM90124) would be permitted</li><li>• The design and layout of the site should take account of the Conservation Area, the setting of the Scheduled Monuments and trees on/adjacent to the site</li><li>• Access to the site should be in a location which results in the least disruption to the existing stone wall along the southern boundary of the site. A Transport Statement would be required</li><li>• Existing trees/hedging within and</li></ul>	
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			<p>on the boundaries of the site must be retained and protected</p> <ul style="list-style-type: none"> <li>In order to safeguard the character of the Conservation Area and adjacent listed buildings, dwellinghouses should be restricted to single storey.</li> </ul>	
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. <b>(82)</b>	See above.	It is recommended that the Council agrees to allocate this site (AMELR013) within the Proposed Local Development Plan.
Melrose	AMELR013 (Harmony Hall Gardens)	SEPA note that a Flood Risk Assessment is required and that there are water environment considerations. <b>(119)</b>	Comments noted. It is recommended that the following is added as a new bullet point to the site requirements: 'The site has water environment considerations'.	It is recommended that the Council agrees to add the following site requirement attached to (AMELR013) to read as follows: 'The site has water environment considerations'
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	Comments noted. It is recommended that the following is added to the sixth site requirement: 'Early engagement with Historic Environment Scotland is required'.	It is recommended that the Council agrees to allocate this site (AMELR013) within the Proposed Local Development Plan and that the following is added to the sixth site requirement: 'Early engagement with

		Proposed Plan, HES would expect early engagement on any detailed proposals for this site. <b>(164)</b>		Historic Environment Scotland is required'.
Melrose	AMELR013 (Harmony Hall Gardens)	<p>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.</p> <p>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.</p> <p>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:</p> <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</p>	<p>The site (AMELR013) was identified within the Main Issues Report as an 'alternative' option. The site assessment concluded the following:</p> <p>There are clearly sensitive issues which require to be addressed such as the location of the site within the Conservation Area and its proximity to listed buildings. The eastern third of the site is within the Melrose Abbey Scheduled Monument Area and would be excluded from development. Furthermore, archaeological remains are likely within the remainder of the site which would require investigation. It is likely an acceptable access on the western part of the site could be formed with minimal disturbance to the existing walls. It is considered that the development of this sensitive site would be acceptable in principle subject to the following:</p> <ul style="list-style-type: none"> <li>• A Flood Risk Assessment is required which should take cognisance of a mill lade which previously flowed along the northern boundary and the River Tweed.</li> <li>• Retain and protect the existing</li> </ul>	It is recommended that the Council agrees to allocate this site (AMELR013) within the Proposed Local Development Plan.

		<p>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</p>	<p>boundary features and trees, where possible</p> <ul style="list-style-type: none"> <li>• Assessment of ecology impacts and provision of mitigation, as appropriate</li> <li>• Mitigation required to ensure no significant adverse effects upon integrity of River Tweed Special Area of Conservation</li> <li>• Archaeological assessment (including archaeological evaluation) is required, with any associated mitigation as identified</li> <li>• Development must respect the setting of the Scheduled Monument. No development within the Melrose Abbey Scheduled Monument (SM90124) would be permitted</li> <li>• The design and layout of the site should take account of the Conservation Area, the setting of the Scheduled Monuments and trees on/adjacent to the site</li> <li>• Access to the site should be in a location which results in the least disruption to the existing stone wall along the southern boundary of the site. A Transport Statement would be required</li> <li>• Existing trees/hedging within and on the boundaries of the site must be retained and protected</li> <li>• In order to safeguard the character of the Conservation Area and adjacent listed</li> </ul>	
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		<p>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 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</p>	<p>buildings, dwellinghouses should be restricted to single storey.</p> <p>Melrose is located within the Central Borders where market demand is strong. It is therefore considered that this is a suitable site for development provided the issues above are addressed.</p>	
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		<p>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,</p>		
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		<p>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 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. <b>(238)</b></p>		
Melrose	AMELR013 (Harmony Hall)	This open space, once an orchard, and still containing fruit trees, is not an appropriate	The site (AMELR013) was identified within the Main Issues Report as an	It is recommended that the Council

	Gardens)	<p>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.</p> <p><b>(143)</b></p>	<p>'alternative' option. The site assessment concluded the following:</p> <p>There are clearly sensitive issues which require to be addressed such as the location of the site within the Conservation Area and its proximity to listed buildings. The eastern third of the site is within the Melrose Abbey Scheduled Monument Area and would be excluded from development. Furthermore, archaeological remains are likely within the remainder of the site which would require investigation. It is likely an acceptable access on the western part of the site could be formed with minimal disturbance to the existing walls. It is considered that the development of this sensitive site would be acceptable in principle subject to the following:</p> <ul style="list-style-type: none"> <li>• A Flood Risk Assessment is required which should take cognisance of a mill lade which previously flowed along the northern boundary and the River Tweed.</li> <li>• Retain and protect the existing boundary features and trees, where possible</li> <li>• Assessment of ecology impacts and provision of mitigation, as appropriate</li> <li>• Mitigation required to ensure no</li> </ul>	<p>agrees to allocate this site (AMELR013) within the Proposed Local Development Plan.</p>
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			<p>significant adverse effects upon integrity of River Tweed Special Area of Conservation</p> <ul style="list-style-type: none"><li>• Archaeological assessment (including archaeological evaluation) is required, with any associated mitigation as identified</li><li>• Development must respect the setting of the Scheduled Monument. No development within the Melrose Abbey Scheduled Monument (SM90124) would be permitted</li><li>• The design and layout of the site should take account of the Conservation Area, the setting of the Scheduled Monuments and trees on/adjacent to the site</li><li>• Access to the site should be in a location which results in the least disruption to the existing stone wall along the southern boundary of the site. A Transport Statement would be required</li><li>• Existing trees/hedging within and on the boundaries of the site must be retained and protected</li><li>• In order to safeguard the character of the Conservation Area and adjacent listed buildings, dwellinghouses should be restricted to single storey.</li></ul> <p>Melrose is located within the Central Borders where market demand is strong.</p>	
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			<p>The Agent has confirmed that the Book Festival rent the field on an annual basis and there is no obligation for this to be renewed however the arrangement currently suits both parties and therefore has carried on for a few years. The Trust has other land in Melrose which may be able to accommodate the Book Festival and it is possible that other third party owned sites in Melrose may be able to host the event.</p> <p>It is therefore considered that this is a suitable site for development provided the issues above are addressed.</p>	
Melrose	AMELR013 (Harmony Hall Gardens)	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. <b>(119)</b>	Comments noted. It is recommended that the following is added to the first site requirement: 'The mill lade may be culverted through this site. Opportunities should be taken to de-culvert this as part of any development'.	It is recommended that the Council agrees to add the following to the first site requirement attached to (AMELR013) as follows: 'The mill lade may be culverted through this site. Opportunities should be taken to de-culvert this as part of any development'.
Melrose	AMELR013 (Harmony Hall)	SNH highlight that the site lies within the Eildon & Leaderfoot Hills NSA. While well contained, the	Comments noted. The site (AMELR013) was identified within	It is recommended that the Council

	Gardens)	<p>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. <b>(213)</b></p>	<p>the Main Issues Report as an 'alternative' option. The site assessment concluded the following:</p> <p>There are clearly sensitive issues which require to be addressed such as the location of the site within the Conservation Area and its proximity to listed buildings. The eastern third of the site is within the Melrose Abbey Scheduled Monument Area and would be excluded from development. Furthermore, archaeological remains are likely within the remainder of the site which would require investigation. It is likely an acceptable access on the western part of the site could be formed with minimal disturbance to the existing walls. It is considered that the development of this sensitive site would be acceptable in principle subject to the following:</p> <ul style="list-style-type: none"> <li>• A Flood Risk Assessment is required which should take cognisance of a mill lade which previously flowed along the northern boundary and the River Tweed.</li> <li>• Retain and protect the existing boundary features and trees, where possible</li> <li>• Assessment of ecology impacts and provision of mitigation, as appropriate</li> </ul>	<p>agrees to allocate this site (AMELR013) within the Proposed Local Development Plan.</p>
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			<ul style="list-style-type: none"> <li>• Mitigation required to ensure no significant adverse effects upon integrity of River Tweed Special Area of Conservation</li> <li>• Archaeological assessment (including archaeological evaluation) is required, with any associated mitigation as identified</li> <li>• Development must respect the setting of the Scheduled Monument. No development within the Melrose Abbey Scheduled Monument (SM90124) would be permitted</li> <li>• The design and layout of the site should take account of the Conservation Area, the setting of the Scheduled Monuments and trees on/adjacent to the site</li> <li>• Access to the site should be in a location which results in the least disruption to the existing stone wall along the southern boundary of the site. A Transport Statement would be required</li> <li>• Existing trees/hedging within and on the boundaries of the site must be retained and protected</li> <li>• In order to safeguard the character of the Conservation Area and adjacent listed buildings, dwellinghouses should be restricted to single storey.</li> </ul>	
Melrose	AMELR013 (Harmony Hall Gardens) &	Contributor objects that the land now submitted for consideration at AMELR014 is not being considered for allocation and contests that it	In respect of AMELR013, the above confirms the reasons for the support of the site within the Proposed LDP.	

	<p>AMELR014 (Land to West of Ormiston Terrace)</p>	<p>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:</p> <ul style="list-style-type: none"> <li>• The site is free from flood risk.</li> <li>• Water supply, foul connections and surface-water can all be dealt with.</li> <li>• The site is not located in or adjacent to an SAC, SPA, SSSI or RAMSAR. The site is within the NSA.</li> </ul> <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</p>	<p>In respect of AMELR014, the following in a copy of the site assessment which explains the reasons for the exclusion of the site within the Proposed LDP:</p> <p><i>‘The site (AMELR014) was submitted for housing, at the MIR Consultation stage. This site formed part of a larger site, which was considered as part of the Local Plan 2005/6 (EM22), however was not included within the Local Plan. This site lies to the west of the Melrose development boundary and adjacent to the Conservation Area. Melrose has good access to public transport, employment &amp; services and is within close proximity to Tweedbank train station, which provides good connections to Edinburgh. There are a number of constraints identified, which are outlined below;</i></p> <ul style="list-style-type: none"> <li>- MOD Safeguarded area;</li> <li>- The site lies adjacent to the Melrose Conservation Area;</li> <li>- Potential archaeology within the site, evaluation and mitigation required;</li> <li>- Part of the site is within the Inventory Battlefield of Darnick;</li> <li>- Site is located within the Eildon &amp; Leaderfoot Hills National Scenic Area;</li> <li>- Site is constrained within the Landscape Capacity Study;</li> </ul>	
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		<p>contends that the site is:</p> <ul style="list-style-type: none"> <li>• Deliverable within the short term because there is a market for the location</li> <li>• The site is located within the central hub</li> <li>• Provides a more suitable expansion to Melrose than the alternative land proposed at Harmony Hall Gardens (AMELR013)</li> <li>• Is of a suitable scale in size</li> <li>• Of minimal impact to its surrounds. <b>(94)</b></li> </ul>	<p>- Limited capacity at Melrose WWTW; and</p> <p>- Requirement for non-vehicular access to Core Path 10.</p> <p><i>Furthermore, the site is located within one of the most sensitive parts of the CAT policy area, where coalescence between Darnick and Melrose is of a key concern. The proposal cannot be considered further due to the unacceptable harm to the distinct identities of these settlements the proposed development would result in.</i></p> <p><i>In conclusion, taking the above into consideration, it is not considered that this site is acceptable for development and will not be included within the Proposed Plan.'</i></p>	
Melrose	General	<p>The contributor is of the view that there shouldn't be any more housing developments in Melrose as it would spoil the aesthetics of a small town dependent on tourism. <b>(272)</b></p>	<p>Melrose is located within the Central Borders and is a desirable place to live although it is very challenging finding new sites for allocation. Market demand within the town is strong. The Proposed Local Development Plan proposes the allocation of one additional site at Harmony Hall Gardens for 5 units. It is considered that the site could be developed without having a detrimental impact upon the character of the town.</p>	No action required.
Newtown St Boswells	ANEWT009 (Land South of Whitehill I)	<p>The contributor proposes a site for a housing allocation within LDP2. The area proposed for development would extend from the existing</p>	<p>The site (ANEWT009) was previously considered at the 'Pre MIR' stage and was not included</p>	It is recommended that the Council agrees not to

		<p>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 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</p>	<p>within the MIR. The site assessment concluded the following:</p> <p><i>'The majority of this site was considered as part of the previous Local Plan 1 and the Local Development Plan Examination under site code ANEWT008. The LDP Reporter's conclusions raised the following concerns:</i></p> <p><i>"As local considerations are concerned, the council has drawn attention to the findings of the report into the inquiry of the current local plan. That report emphasised the importance of the settlement identities of Newtown St Boswells and St Boswells to the south. Taking into account the proposed housing land allocation at site ANEWT005, the separation distance is some 600 metres. This is a narrow but sensitive strip which I agree is important in visually containing the two settlements. The contours of the land within the strip, particularly the low hillock, assist in providing visual separation.</i></p> <p><i>The findings of the previous inquiry also attached importance to the need to retain the northern side of the A699 free from development. I agree that, despite the tree belt shown on the indicative plan, the</i></p>	<p>allocate this site (ANEWT009) within the Proposed Local Development Plan.</p>
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		<p>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. <b>(104)</b></p>	<p><i>degree of urban encroachment on the A699 would be unacceptable and result in an adverse landscape character impact on this area of essentially rural character.</i></p> <p><i>Having regard to the local adverse impact that would result as a consequence of the proposed enlarged expansion area, despite the strategic housing land assessment; I conclude that the additional housing land allocation is not justified”.</i></p> <p><i>Officer conclusions:</i></p> <p><i>The site is centrally located within the Scottish Borders and benefits from good access to public services and access to employment. It is generally out with the 1 in 200 year flood envelope although small parts beside the West Burn and the Bowden Burn. There may be a need for surface water management to be employed in this area. Biodiversity Risk is moderate due to location next to Bowden Burn and its connectivity with River Tweed SAC/SSSI. The site is located to the south of Newtown St Boswells and directly south of the planned expansion of Newtown St Boswells (ANEWT005). Development of the site would be stretching into the fields south of the village towards</i></p>	
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			<p><i>Charlesfield and St Boswells. There is a risk or coalescence with St Boswells as well as potential for archaeology in the area. This is a large site which requires detailed development/landscape appraisal.'</i></p> <p>It is recommended that the Council agrees not to allocate this site within the Proposed Local Development Plan.</p>	
Newtown St Boswells	BNEWT002 (Land North West of the Holmes Barns)	<p>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 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.</p> <p><b>(136)</b></p>	<p>The site assessment concluded the following: <i>'Whilst the principle of business land at this location is considered to be acceptable, there is already a substantial area of land designated for business use within the Local Development Plan 2016 (BNEWT001) to the immediate north of the site. Furthermore, any development of this site would be limited by the area that would be required for the provision of a roundabout required as part of the Newtown St. Boswells Development Framework.</i></p> <p><i>There is a high voltage electricity cable running across the site which would require to be relocated and it is understood there is waste material under the site which may make construction more expensive. These matters would require to be considered as part of any development.</i></p>	It is recommended that the Council agrees not to allocate this site (BNEWT002) within the Proposed Local Development Plan.

			<p><i>Due to the proximity of the site to existing residential properties and the potential conflict of uses, use classes 5 or 6 may be difficult to support from an Environmental Health point of view.</i></p> <p><i>There is no Waste Water Treatment Works to serve any development at this location.</i></p> <p><i>It is considered that given the extensive existing business allocation at Tweed Horizons (BNEWT001) and the potential issue of any development on this site interfering with any future roundabout required as part of the Newtown St. Boswells Development Framework that this site is not currently appropriate for development. It is not considered that the submission has justified the need for business land at this location.'</i></p> <p>For the aforesaid reasons, the site should not be included within the Proposed LDP for business/industrial land.</p>	
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. <b>(7)</b>	Comments noted and agreed.	No action required.
Tweedbank	MTWEE002 (Lowood)	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	This site was allocated with an indicative capacity of 300 units through the process of the Council's Supplementary Guidance on	No action required.

		<p>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 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</p>	<p>Housing. This was approved by the Scottish Ministers. The allocation of this site for mixed use development has therefore been accepted and cannot now be questioned.</p> <p>It is contended the site is within a highly attractive landscape setting in a central location within a well-established housing market area. The site adjoins the Tweedbank Railway terminus and is in compliance with the principles of the Railway Blueprint. It is not suggested that the indicative number of units will be built within a 5-year period. This was not a requirement of the SG on Housing. Typically, a site of this size in the Borders may take some time to be completed notwithstanding the fact the Council remains clear the site will be a highly popular option for potential housebuilders and house purchasers.</p>	
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		<p>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. <b>(92)</b></p>		
Selkirk	ASELK030 (Land to the West of Calton Cottage)	<p>Object to the exclusion of the site from the MIR. The following points must be considered:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• It is not unusual for settlement boundaries to be extended to incorporate sites which otherwise have good potential. <b>(11)</b></li> </ul>	<p>The site (ASELK030) was previously considered at the 'Pre MIR' stage and was not included within the MIR. The site assessment concluded the following:</p> <p><i>'The site was considered as part of the Housing SG. An initial stage 1 RAG assessment was undertaken, however concluded that the site should not be taken forward as part of the Housing SG. The conclusion of the assessment is as follows and remains relevant to this proposal:</i></p> <p><i>This site is located outwith Selkirk, but partially borders the settlement boundary. Although partially adjacent to the settlement boundary, the site is notably detached from the built up parts of the town.</i></p> <p><i>There are two existing housing</i></p>	<p>It is recommended that the Council agrees not to allocate this site (ASELK030) within the Proposed Local Development Plan.</p>

			<p><i>allocations nearby, Philiphaugh North and Philiphaugh Steading. Another site has been proposed through the SG process at the Angle's Field. It would be preferable for some or all of these allocated sites to be developed before any land beyond the settlement boundary in this part of Selkirk was considered.</i></p> <p><i>Overall, the site's poor relationship with Selkirk prevents the site from progressing to Stage 2 assessment.</i></p> <p><i>Furthermore, the site is unacceptable from a roads point of view given the detached location of the site. The site is out on a limb and difficult to integrate with other housing developments within Selkirk. Furthermore, it is unlikely that an acceptable access arrangement could be achieved and the existing road network does not have the required pedestrian facilities that a development of this size would require.'</i></p> <p>It is recommended that the Council agrees not to allocate this site within the Proposed Local Development Plan.</p>	
Selkirk	ASELK031 (Land North of Bannerfield)	<p>Object to the exclusion of the site from the MIR. The following points must be considered:</p> <ul style="list-style-type: none"> <li>• The scale of the site could be extended or reduced. The owner would consider detached</li> </ul>	<p>The site (ASELK031) was previously considered at the 'Pre MIR' stage and was not included within the MIR. The site</p>	<p>It is recommended that the Council agrees not to allocate this site</p>



		<p>villa style development should that be deemed most appropriate.</p> <ul style="list-style-type: none"> <li>• The issues related to topography and infrastructure are not considered to be impossible and could add additional amenity and desirability to the site. <b>(11)</b></li> </ul>	<p>assessment concluded the following:</p> <p><i>'The site area and capacity was reduced for the purposes of the consultation process during the process of the Housing SG 2017 as it was considered that a reduced area/capacity was worth exploring.</i></p> <p><i>There is a small area within the site that may be at risk of surface water flooding which would require investigation as well as surface water run-off from the nearby hills. There are no significant biodiversity issues relating to the site. Whilst this area of Selkirk is some distance from the town, there are facilities within the vicinity, including Philiphaugh Primary School.</i></p> <p><i>The site is located adjacent to the settlement boundary of Selkirk, to the north of Bannerfield. Part of the site has been considered previously in 2006, and was discounted for the reason that "the site is detached from the settlement by a steep, tree covered bank". However, the Scottish Borders Development and Landscape Capacity Study (February 2007) states that "there is potentially scope for several houses to be located to extend the existing pattern of individual house development north east of Levenlea,</i></p>	<p>(ASELK031) within the Proposed Local Development Plan.</p>
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			<p><i>sited behind the belt of woodland which extends along the roadside. These proposals were not, however, interpreted as offering a serious expansion opportunity for Selkirk, as this area, while technically part of Selkirk, feels very detached from the main settlement". It is therefore considered that the principle of residential development at this location may be acceptable. However, the extent of the site from that submitted during the 'Call for Sites' was significantly reduced for the consultation process during the Housing SG 2017. Consideration would need to be given to the location of the site within a Special Landscape Area. Detached villa development would be most appropriate to the location.</i></p> <p><i>However, it is not possible to achieve an appropriate access into the site due to topography and the elongated nature of the site. It is not therefore considered that this proposal can be supported from a roads point of view.'</i></p> <p>It is recommended that the Council agrees not to allocate this site within the Proposed Local Development Plan.</p>	
Selkirk	ASELK032 (Philiphaugh Nursery)	<p>Object to the exclusion of the site from the MIR. The following points must be considered:</p> <ul style="list-style-type: none"> <li>• The site has been incorrectly safeguarded as</li> </ul>	<p>The site (ASELK032) was previously considered at the 'Pre MIR' stage and was not included</p>	<p>It is recommended that the Council agrees not to</p>

		<p>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.</p> <ul style="list-style-type: none"> <li>• It is understood archaeological investigations would be required.</li> <li>• 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. <b>(11)</b></li> </ul>	<p>within the MIR. The site assessment concluded the following:</p> <p><i>‘The site was considered as part of the Housing SG. An initial stage 1 RAG assessment was undertaken, however concluded that the site should not be taken forward as part of the Housing SG. The conclusion of the assessment was as follows, this remains relevant to this current assessment:</i></p> <p><i>The site is safeguarded as a Key Greenspace within the Local Development Plan 2016 and is not therefore considered appropriate for a housing allocation. Issues relating to the registered battlefield (Philiphaugh) would require to be investigated further.</i></p> <p><i>Furthermore, the proposal is not supported by the Roads Planning Team as the site does not relate particularly well to the existing settlement offering little in the way of scope for integration with the existing street network. Furthermore, access to it is problematic in terms of visibility due to the horizontal alignment of the A708 along this section.</i></p> <p><i>Whilst the Roads Officer may be in a position to support a reduced size,</i></p>	<p>allocate this site (ASELK032) within the Proposed Local Development Plan. However, it is recommended that the boundaries of Key Greenspace (GSSELK001) named Selkirk Football Club are amended to exclude the existing residential property and associated garden ground/orchard.</p>
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			<p><i>this would not overcome the fact that the site is a Key Greenspace.'</i></p> <p>As noted above, the site previously fell within the Key Greenspace allocation GSSELK001 named 'Selkirk Football Club'. It would appear the site in question has been included within this Key Greenspace allocation in error as the site is clearly an orchard associated with the existing dwellinghouse and does not form part of the pitches associated with Selkirk Football Club. It is proposed that this is rectified. However, the other issues raised above mean that this site cannot be supported for residential development.</p>	
Selkirk	ASELK040 (Philiphaugh Mill)	<p>SEPA continue to maintain that this site should not be included in the LDP2 for the same reasons as outlined in their previous responses:</p> <p>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</p>	<p>SEPA consider the site to be in a 'sparsely developed area'. The Council can confirm that the site is located within the settlement boundary of Selkirk as defined by the Local Development Plan 2016. The site has been allocated in previous years for redevelopment given its former use as a fish farm and the Council's desire to see the site regenerated. The development of the site for residential development is regarded as acceptable in principle. The site is located immediately adjacent to existing residential properties and is accessed along Ettrickhaugh Road which is residential in character.</p>	<p>It is recommended that the Council agrees to allocate this site (ASELK040) within the Proposed Local Development Plan.</p>

		Local Development Plan. <b>(119)</b>	<p>The Council refutes the view that the site is within a 'sparsely developed area'</p> <p>The site is protected from flood risk as a result of the Selkirk Flood Protection Scheme which was completed in February 2017. The scheme provides protection to a 1 in 200 year event plus climate change. The presence of the scheme and the level of protection it affords complies with SEPA Planning Information Note 4 and also SEPA Flood Risk and Land Use Vulnerability Guidance in relation to development behind flood defences in a built up area.</p>	
Selkirk	ASELK040 (Philiphaugh Mill)	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 and national policy. <b>(164)</b>	Comments noted and agreed.	It is recommended that the Council agrees to allocate this site (ASELK040) within the Proposed Local Development Plan.
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. <b>(206)</b>	The site is protected from flood risk as a result of the Selkirk Flood Protection Scheme which was completed in February 2017. The scheme provides protection to a 1 in 200 year event plus climate change. The presence of the scheme and the level of protection it affords complies with SEPA Planning Information Note 4 and also SEPA Flood Risk and Land Use Vulnerability Guidance in	It is recommended that the Council agrees to allocate this site (ASELK040) within the Proposed Local Development Plan.

			relation to development behind flood defences in a built up area.	
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. <b>(305)</b>	Comments noted. It is not anticipated that a Masterplan would be prepared for this for, however, any planning application submitted for the site would be considered against environmental and infrastructure policies.	It is recommended that the Council agrees to allocate this site (ASELK040) within the Proposed Local Development Plan.
Selkirk	ASELK041 (Philiphaugh 2)	The contributor suggests that this site should be allocated for the following reasons: <ul style="list-style-type: none"> <li>• The site is located within the confines of the settlement boundary of Selkirk.</li> <li>• The site represents a natural “infill” housing opportunity and can take advantage of the recent and significant upgrade to the flood defences within Selkirk.</li> <li>• 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.</li> <li>• The site is located close to community facilities, cycle paths, public transport and Selkirk town centre.</li> <li>• It is a sustainable and deliverable site.</li> <li>• It is accepted that technical reports on matters such as flooding would be required at the application stage.</li> <li>• 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. <b>(128 1of2)</b></li> </ul>	The site assessment concluded the following: <p><i>‘The site is a greenfield site, and has flooded in the past. SEPA object to the allocation of the site on flooding grounds on the basis that despite the recent Selkirk Flood Protection Scheme, the site is at risk of flooding. The Council’s Flood Team, however, refute this view and consider that the site is now protected from the 0.5% AEP Event. The Council has recently agreed a planning permission in principle application (PPP) for a residential development on this site. This application has now been referred to Scottish Ministers due to an objection from SEPA.</i></p> <p><i>There is moderate risk to biodiversity and River Tweed SAC mitigation would be required. Accessibility to local services is acceptable. Archaeological</i></p>	It is recommended that the Council agrees not to allocate this site (ASELK041) within the Proposed Local Development Plan.

			<p><i>investigation and mitigation required. Setting of registered battlefield requires consideration. In principle it is considered that the site offers a suitable location for housing. Trees in association with the mill lade would require to be retained and an adequate buffer must be enforced to ensure their successful retention. Site acceptable from a physical access/road capacity point of view and should be linked to existing path network. Possible contamination would require to be investigated and mitigated.</i></p> <p><i>Whilst the site is considered acceptable in principle for residential development, the flood risk objections raised by SEPA would require further discussion. It is considered that this site is of a scale which would not accommodate a significant number of properties. Whilst the indicative number proposed is 15, the planning application discussed above states an indicative number of 6. Given this and the fact the planning application has been referred to Scottish Ministers for this infill site, it is recommended that the site is not taken forward for inclusion within the Proposed Plan. It is acknowledged that the site could be considered again for inclusion in a future LDP.'</i></p>	
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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"> <li>• There is a strong demand for good quality new housing in the Selkirk area.</li> <li>• There are no obvious constraints.</li> <li>• Water and electricity are available to the edge of the site.</li> <li>• The site has good road frontage to the A7 and A699.</li> <li>• Public transport is an important factor and the A7 trunk road is an important factor in terms of access to Hawick, Galashiels etc. <b>(113)</b></li> </ul>	The site assessment concluded the following: <p><i>‘The site is physically separated from the settlement of Selkirk by the A7 and A699 and is on a prominent approach into the town, being on higher ground. The A7 currently acts as a physical barrier. The proposal is not supported by the Roads Officer due to this separation as pedestrian integration would be problematic. This would be further exacerbated if/when the Selkirk Bypass is provided. It is not considered that this site should be taken forward into the Proposed LDP for the aforesaid reasons’.</i></p> <p>It is recommended that the Council agrees not to allocate this site within the Proposed Local Development Plan for the aforesaid reasons.</p>	It is recommended that the Council agrees not to allocate this site (ASELK043) within the Proposed Local Development Plan.
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. <b>(258)</b>	Comments noted. As this project has no funding nor definitive support from the Scottish Government at this time, there is currently no scope to undertake a detailed survey of the potential route.	No action required.
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. 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.	Comments noted. It is noted that there is a planning application currently pending consideration for the erection of 13 dwellinghouses on land at Kerr’s Land (19/00074/FUL). This is a longstanding allocated site (ESE2). Following public consultation prior to	No action required.



		<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! <b>(305)</b></p>	<p>the Main Issues Report publication, it was established that there is demand in Selkirk for new build properties but these are very rarely forthcoming to the market. Finding land for housing allocations in Selkirk is challenging for a number of reasons including topography, access and flood risk objections from SEPA. However, it is considered there is sufficient land allocated to satisfy demand within the LDP period.</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. <b>(13)</b></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. <b>(13)</b></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 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</p>	<p>The site (ASTIC003) was previously considered at the 'Pre MIR' stage and was not included within the MIR. The site assessment concluded the following:</p> <p><i>The site was considered as part of the Housing SG. An initial stage 1 RAG assessment was undertaken, however concluded that the site should not be taken forward as part of the Housing SG. The conclusion of the assessment is as follows:</i></p> <p><i>The site was previous considered in the preparation of the Local Plan. The site was rejected on roads access grounds.</i></p> <p><i>The site sits within Central HMA but is outwith the SDAs. There are no current allocations within the settlement, but there has been recent development within Stichill</i></p>	<p>It is recommended that the Council agrees not to allocate this site (ASTIC003) within the Proposed Local Development Plan.</p>

		<p>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. <b>(13)</b></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. <b>(13)</b></p>	<p><i>following the erection of 8 dwelling houses at land south of the B6364. The proposed 16 units at this site would represent further relatively large scale development for a small settlement such as Stichill.</i></p> <p><i>The site is situated within the SBC designated Stichill Designed Landscape, which relates to the now-demolished Stichill House. The site is located within close proximity to two C Listed Buildings, including the gates to Stichill House.</i></p> <p><i>There are no known key services provided in Stichill. The nearest primary school is located in nearby Ednam. Stichill is considered to have poor local service accessibility.</i></p> <p><i>The site submission does not confirm ownership of the road and consequently the Council is not able to confirm that the access road can be formed to the required adoptable standard. Consequently it is considered at this point in time that the proposal is premature and cannot be confirmed as being effective within this SG process. If the access issue can be addressed and resolved at a later point in time it consequently may be considered for allocation within a future LDP taking cognisance of any other relevant matters.</i></p>	
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			<p><i>Overall, it is considered that there are better sites available in the Central Housing Market Area and the site should not be considered further."</i></p> <p><b>OVERALL CONCLUSION 2018:</b> <i>The sustainability of a 16 unit allocation in a village with no daily services is very questionable. In terms of the details, the issue of using the shared access has still not been resolved. It is not in the landowners ownership and so the viability of the site's development is undermined. Related to this, that access point would likely require a major impact on or the demolition of the C listed gated entrance to the former Stichill House estate. Comment from HES is required in this regard but it is highly unlikely that this would be supported. The alternative routes suggested do get around this problem technically, but lead to other issues in terms of feasibility and impact on the surrounding area. These alternative accesses need to be assessed further. For the aforesaid reasons, it is not considered that this site can be brought forward for housing within the MIR/LDP2.</i></p> <p>It is recommended that the Council agrees not to allocate this site within</p>	
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			the Proposed Local Development Plan.	
Galashiels / Hawick / Walkerburn	General	Borders towns such as Galashiels, Hawick <b>(233)</b> 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. <b>(149, 229)</b>	Comments noted. Sites are identified within these settlements for housing development as well as redevelopment opportunities.	No action required.
Galashiels / Melrose / Stow	General	The contributor suggests that housing would be best located in Galashiels, Melrose and Stow due to the railway. <b>(300)</b>	Comments noted. Sites are identified within these settlements for housing development. The Central Strategic Development Area, which incorporates both Galashiels and Hawick, seeks to direct growth to these areas. However, this does not mean other areas should be ignored.	No action required.
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. <b>(51)</b>	The Strategic Development Plan requires strategic growth in the Scottish Borders to be directed to this Central area as well as the Eastern and Western Borders. Towns within these areas, including Galashiels, should provide the focus for retail, commercial and strategic opportunities. Improved connectivity from Edinburgh to the north and from Newcastle and Carlisle to the south are recognised as being essential for the future economic growth of the area. The LDP addresses these matters.	No action required.
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. <b>(139)</b>	Comments noted and agreed. The LDP addresses this.	No action required.

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 Borders General Hospital. The contributor suggests various broad sites within the Galashiels/Tweedbank/Melrose area. <b>(90)</b>	A site at Tweedbank (Lowood, MTWEE002) is identified for mixed use development within the Plan. This is a substantial site of 34ha with an indicative capacity of 300 dwelling units. It is possible that the site could accommodate a care facility for the elderly.	No action required.
Planning for Housing: Question 7	Railway Corridor – Edinburgh to Galashiels	With regard to the location of whatever is determined to be the necessary additional quantity of housing, what consideration has been given to achieving this requirement by means of building a new town similar to Cardrona at a sensible point along the railway line from Galashiels to Edinburgh? Surely this is a sensible option to pursue given the taxpayers' huge investment in the railway and the ability through such an approach for residents to be close to but not encroaching upon a major Borders town (Galashiels). <b>(73)</b>	The option of a new settlement is one which can be considered and may become a focus in the future. The Council is content, however, that at this point in time the requisite housing figures can be accommodated within/adjacent to existing settlements where a range of services and infrastructure is available.	No action required.
Planning for Housing: Question 7	General	The contributor suggests old mills in Hawick are used and converted into flats or apartments. <b>(296)</b>	The Council encourages the redevelopment of former mill buildings through Policy ED5 – Regeneration. The Local Development Plan allocates redevelopment opportunities across the Borders, although these allocations are not exhaustive. The aim of this policy is to encourage redevelopment of such allocations for a variety of uses including housing, employment or retailing which will support the opportunity of	No action required.

			bringing such land back into productive use and to enhance the surrounding environment.	
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). <b>(294)</b>	Comments noted. The Proposed Local Development Plan seeks to promote the most sustainable means of travel and does seek to allocate sites within settlements served by the Borders Railway. This has proved difficult in Galashiels and Stow where various constraints to development are pertinent.  Due to other constraints, it has proved difficult to identify sites within Galashiels although one site has been identified at Netherbarns.	No action required.
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. <b>(30)</b>	The Main Issues Report did not propose any further longer term housing development within the Eildon Locality as these already exist within the Scottish Borders Local Development Plan 2016 and these will be carried forward into the Proposed Plan. It is not considered necessary to propose further longer term housing development within the Eildon Locality	No action required.

## 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	Proposed Response to Main Issues Raised	Recommendation
Darnick, Denholm, Dolphinton, Eddleston, Gordon, Grantshouse, Greenlaw, Hawick, Jedburgh, Oxton, Peebles, Smailholm & Westruther	All preferred housing sites	<p>The contributor <b>agrees</b> with all the preferred options for housing within the MIR. <b>(171, 230, 263, 274)</b></p> <p>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. <b>(119)</b></p>	<p>Comments are noted</p> <p>It should be noted that the housing site (AEDDL009) in Eddleston was included within the Main Issues Report. However, throughout the course of the MIR consultation process it became evident that the northern part of the site was in a separate ownership. Therefore, the site was reduced in size, the site capacity reduced and a new site code plotted as (AEDDL010). The site (AEDDL010) is proposed for inclusion within the Proposed LDP.</p>	<p>It is recommended that the Council agree not to allocate the following sites within the Proposed Local Development Plan; (ADENH006) Denholm, (ADOLP004) Dolphinton, (AEDDL009) Eddleston and (ASMAI002) Smailholm.</p> <p>It is recommended that the Council agree to allocate the following sites within the Proposed Local Development Plan; (ADARN005) Darnick, (AEDDL010) Eddleston, (AGORD004) Gordon, (AGRAN004) Grantshouse, (AGREE009)</p>

				Greenlaw, (AHAWI027) Hawick, (AJEDB018) Jedburgh, (AOXTO010) Oxton, (APEEB056) Peebles and (AWESR002) Westruther.
Darnick, Denholm, Dolphinton, Eddleston, Gordon, Grantshouse, Greenlaw, Hawick, Jedburgh, Oxton, Peebles, Smailholm & Westruther	All preferred housing sites	The contributor <b>disagrees</b> with all the preferred options for housing within the MIR. <b>(90, 166, 172, 207, 209, 233)</b>  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. <b>(117)</b>	Comments are noted.  Comments are noted regarding the Western Borders. The Proposed LDP identifies a range and choice of housing sites throughout the Scottish Borders. It should be noted that due to a number of physical and infrastructure constraints further housing site options are limited. The Council appointed consultants to prepare a study to identify both potential short and long term housing options and their findings have influenced the housing proposals within the Tweeddale area.  It should be noted that the housing site (AEDDL009) in Eddleston was included within the Main Issues Report. However, throughout	It is recommended that the Council agree not to allocate the following sites within the Proposed Local Development Plan; (ADENH006) Denholm, (ADOLP004) Dolphinton, (AEDDL009) Eddleston and (ASMAI002) Smailholm.  It is recommended that the Council agree to allocate the following sites within the Proposed Local Development Plan; (ADARN005) Darnick, (AEDDL010) Eddleston,



			<p>the course of the MIR consultation process is became evident that the northern part of the site was in a separate ownership. Therefore, the site was reduced in size, the site capacity reduced and a new site code plotted as (AEDDL010). The site (AEDDL010) is proposed for inclusion within the Proposed LDP.</p>	<p>(AGORD004) Gordon, (AGRAN004) Grantshouse, (AGREE009) Greenlaw, (AHAWI027) Hawick, (AJEDB018) Jedburgh, (AOXTO010) Oxton, (APEEB056) Peebles and (AWESR002) Westruther.</p>
<p>Ancrum, Coldstream, Crailing, Darnick, Dolphinton, Denholm, Eckford, Eddleston, Ednam, Galashiels, Gordon, Grantshouse, Greenlaw, Hawick, Jedburgh, Melrose, Oxton, Peebles, Reston, Selkirk, Smailholm, Westruther</p>	<p>All preferred and alternative sites</p>	<p>The contributor <b>disagrees</b> with all the housing options (preferred and alternative) within the MIR. <b>(95, 150, 170, 175, 193,194, 204, 217, 265)</b></p>	<p>Comments are noted.</p> <p>It should be noted that the housing site (AEDDL009) in Eddleston was included within the Main Issues Report. However, throughout the course of the MIR consultation process is became evident that the northern part of the site was in a separate ownership. Therefore, the site was reduced in size, the site capacity reduced and a new site code plotted as (AEDDL010). The site (AEDDL010) is proposed for inclusion within the Proposed LDP.</p>	<p>It is recommended that the Council agree not to allocate the following sites within the Proposed Local Development Plan; (AANCR002) Ancrum, (ACRAI004) Crailing, (ADENH006) Denholm, (ADOLP004) Dolphinton, (AECKF002) Eckford, (AEDDL008) Eddleston, (AEDDL009) Eddleston,</p>

				<p>(AEDNA011) Ednam, (AEDNA013) Ednam, (AGREE008), Greenlaw and (ASMAI002) Smailholm.</p> <p>It is recommended that the Council agree to allocate the following sites within the Proposed Local Development Plan; (ACOLD014) Coldstream, (ADARN005) Darnick, (AEDDL010) Eddleston, (AGALA029) Galashiels, (AGORD004) Gordon, (AGRAN004) Grantshouse, (AGREE009) Greenlaw, (AHAWI027) Hawick, (AJEDB018) Jedburgh, (AOXTO010), Oxton, (AMELR013) Melrose,</p>
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				(APEEB056) Peebles. (AREST005) Reston, (ASELK040) Selkirk and (AWESR002) 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 <b>agrees</b> with the preferred and alternative housing options within the MIR <b>(259, 262)</b>  The contributor generally <b>agrees</b> , but difficult to comment when sites are across various settlements. <b>(289)</b>	Comments are noted.  It should be noted that the housing site (AEDDL009) in Eddleston was included within the Main Issues Report. However, throughout the course of the MIR consultation process it became evident that the northern part of the site was in a separate ownership. Therefore, the site was reduced in size, the site capacity reduced and a new site code plotted as (AEDDL010). The site (AEDDL010) is proposed for inclusion within the Proposed LDP.	It is recommended that the Council agree not to allocate the following sites within the Proposed Local Development Plan; (AANCR002) Ancrum, (ACRAI004) Crailing, (ADENH006) Denholm, (ADOLP004) Dolphinton, (AECKF002) Eckford, (AEDDL008) Eddleston, (AEDDL009) Eddleston, (AEDNA011), Ednam, (AEDNA013) Ednam, (AGREE008), Greenlaw and (ASMAI002) Smailholm.

				<p>It is recommended that the Council agree to allocate the following sites within the Proposed Local Development Plan; (ACOLD014) Coldstream, (ADARN005) Darnick, (AEDDL010) Eddleston, (AGALA029) Galashiels, (AGORD004) Gordon, (AGRAN004) Grants house, (AGREE009) Greenlaw, (AHAWI027) Hawick, (AJEDB018) Jedburgh, (AOXTO010), Oxton, (AMELR013) Melrose, (APEEB056) Peebles, (AREST005) Reston, (ASELK040) Selkirk and (AWESR002) Westruther.</p>
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<p>Ancrum, Coldstream, Crailing, Darnick, Dolphinton, Denholm, Eckford, Eddleston, Ednam, Galashiels, Gordon, Grantshouse, Greenlaw, Hawick, Jedburgh, Melrose, Oxtou, Peebles, Reston, Selkirk, Smailholm, Westruther</p>	<p>All preferred and alternative sites</p>	<p>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.</p> <p>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 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. <b>(323)</b></p>	<p>Comments are noted.</p> <p>Scottish Water were consulted on all sites contained within the Main Issues Report. It should be noted they their comments were taken on board in the site requirements, for any sites ultimately included within the Proposed LDP.</p> <p>It should be noted that Scottish Borders Council will continue to have regular update meetings with Scottish Water and SEPA, to ensure that they are kept up to date with developments and the progress of the LDP.</p> <p>It should be noted that the housing site (AEDDL009) in Eddleston was included within the Main Issues Report. However, throughout the course of the MIR consultation process is became evident that the northern part of the site was in a separate ownership. Therefore, the site was reduced in size, the site capacity reduced and a new site code plotted as (AEDDL010). The site (AEDDL010) is proposed for</p>	<p>It is recommended that the Council agree not to allocate the following sites within the Proposed Local Development Plan; (AANCR002) Ancrum, (ACRAI004) Crailing, (ADENH006) Denholm, (ADOLP004) Dolphinton, (AECKF002) Eckford, (AEDNA011), Ednam (AEDDL008) Eddleston, (AEDDL009) Eddleston, (AEDNA013) Ednam, (AGREE008), Greenlaw and (ASMAI002) Smailholm.</p> <p>It is recommended that the Council agree to allocate the following sites within the Proposed Local Development Plan; (ACOLD014)</p>
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			inclusion within the Proposed LDP.	Coldstream, (ADARN005) Darnick, (AEDDL010) Eddleston, (AGALA029) Galashiels, (AGORD004) Gordon, (AGRAN004) Grantshouse, (AGREE009) Greenlaw, (AHAWI027) Hawick, (AJEDB018) Jedburgh, (AOXTO010), Oxton, (AMELR013) Melrose, (APEEB056) Peebles, (AREST005) Reston, (ASELK040) Selkirk and (AWESR002) Westruther.
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. <b>(203)</b>	Comments are noted.  Scottish Planning Policy (SPP) sets out that ' <i>the level of affordable housing required as a contribution within a market site should generally be no more than</i>	No action required.

			<p><i>25% of the total number of houses'.</i></p> <p>Policy HD1: Affordable Housing Delivery contained within the Proposed LDP, aims to ensure that new housing development provides an appropriate range and choice of 'affordable' units as well as mainstream market housing. The policy states that decision making will be guided by the Council's SPG on Affordable Housing although, in accordance with SPP, the level of contribution within a market site will generally be no more than 25% of the total number of houses. The percentage may be varied depending on the site characteristics or the information available on local need. The SPG sets out the threshold requirement for on-site affordable housing and commuted sum contributions.</p>	
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. <b>(301)</b>	Comments are noted.	No action required.
Planning for Housing: Question 7	Alternative locations for development	The contributor suggests alternative locations for development; Galashiels, Hawick, Peniculk and West Linton. <b>(227)</b>	<p>Comments are noted.</p> <p>It should be noted that Peniculk is not located within</p>	No action required.

			<p>the Scottish Borders. Furthermore, the Proposed LDP proposes a range and choice of sites throughout the Scottish Borders.</p> <p>The contributor does not suggest specific sites, rather alternative settlements for development. Any additional sites submitted for consideration as part of the 'MIR Consultation' process have been subject to a full site assessment and consultation.</p>	
<p>Planning for Housing: Question 7</p>	<p>Allocations</p>	<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. <b>(306)</b></p>	<p>Comments are noted.</p> <p>The Proposed LDP includes a range of sites, in respect of size and location, throughout the Scottish Borders. This ensures that there is a range and choice of sites available for developers.</p> <p>Comments are noted regarding the consultation on the MIR. The MIR was prepared based upon the housing land requirement set out within the SESPlan Proposed Plan, which was derived from the HNDAs 2015. This was in accordance with the SESPlan Housing Background Paper (October</p>	<p>No action required.</p>



			<p>2016), which set out the background, process and justification for the housing supply targets and housing land requirements.</p> <p>The current SDP was approved in June 2013. However, the proposed SDP which was intended to replace SDP 2013 was rejected by Scottish Ministers on the 16<sup>th</sup> May 2019. QC advice was that, whilst out of date, SDP 2013 remains the approved Strategic Plan and must therefore continue to be referred to. However advice also stated that whilst the proposed SDP was rejected there are elements of the supporting technical papers and documents which helped guide the proposed SDP and incorporate more up to date positions, which should be considered as material considerations. HNDA2 is at present the most up to date and therefore reliable assessment of housing need and demand in the SESPlan area.</p> <p>Appendix 2 of the Proposed Plan and the Housing Technical Note set out the</p>	
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			housing land requirement and contributions towards the requirement for the Scottish Borders. The housing supply target and housing land requirement are informed by the HNDA2.	
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. <b>(199)</b>	Comments are noted.  The contributor provided comments on specific sites in respect of the ancient woodland and ancient & veteran trees, as part of the 'MIR Consultation' process. It should be noted that these site specific comments have been noted and incorporated where considered necessary. The comments and responses to the individual sites are contained within these tables.	No action required.
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; <ul style="list-style-type: none"> <li>• Why is the effective figure so low at 40% of the total and what actions are you taking to increase that percentage;</li> <li>• When you have nearly 10 years effective housing</li> </ul>	Comments are noted.  Firstly, the MIR was prepared based on the 2018 HLA. The effective housing land supply set out within the 2018 HLA was 3,668 units. The remainder of the established housing land supply is either programmed as potentially effective (Years 6 & 7), post	No action required.

		<p>land supply and need only 5+, why are SBC looking for more sites;</p> <ul style="list-style-type: none"> <li>• The current over supply is more than enough to accommodate the problems of getting sites available in the right places in a rural area.</li> </ul> <p>The contributor raises the following issues with the proposed policy;</p> <ul style="list-style-type: none"> <li>• Such a massive over supply of sites, over the requirement risks development taking place in locations that are not the 1<sup>st</sup> preference of the Council;</li> <li>• Why are the Council identifying so many potential new sites?</li> <li>• 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. <b>(206)</b></li> </ul>	<p>year 7 or constrained. It should be noted that the programming of sites within the HLA can only be a reasonable expression of what can be developed within the time periods and there is a significant degree of uncertainty beyond years 2 and 3. Within the Scottish Borders, programming of the HLA continues to be challenging, due to market conditions being experienced in recent years and the difficulty for developers and potential buyers to obtain finance. A number of sites will be programmed in years 6 &amp; 7 or constrained due to the phasing of developments or marketability.</p> <p>It should be noted that the Housing Technical Note has been updated to sit alongside the Proposed LDP and updated to reflect the 2019 HLA.</p> <p>The new allocations within the Proposed LDP provide additional flexibility within the LDP and have been through a detailed site assessment process.</p>	
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			<p>It should be noted that whilst overall the allocations within the Proposed LDP meet the housing land requirements, in a number of areas, these are concentrated within specific settlements. This is especially evident within the Peebles area. The Council must ensure that there is a range and choice of sites throughout all of the Scottish Borders.</p> <p>Comments are noted regarding investment in infrastructure and services. It should be noted that Education, NHS and the Council's Roads Planning Service were consulted on all the sites included within the MIR.</p>	
<p>Planning for Housing: Question 7</p>	<p>Areas for future housing</p>	<p>The contributor states that housing allocations should be in the following areas:</p> <ul style="list-style-type: none"> <li>• With the best communications such as Tweedbank;</li> <li>• With the highest levels of deprivation and housing need;</li> <li>• In new towns allocated near the new Border Railway, with good road access to the main border towns and</li> <li>• As satellites to existing towns such as occurred with Cardrona next to Peebles. <b>(25)</b></li> </ul>	<p>Comments are noted.</p> <p>In respect of Tweedbank, it should be noted that a new housing allocation was brought forward as part of the Housing SG (MTWEE002), with an indicative site capacity for 300 units.</p> <p>The Proposed LDP allocates a range and choice of sites (sizes and locations) across the whole of the Scottish</p>	<p>No action required.</p>

			<p>Borders. This ensures that there is a range and choice for developers.</p> <p>There are a range of sites currently allocated within proximity of the Borders Railway. As part of the Proposed LDP housing sites are proposed in Darnick (ADARN005), Galashiels (AGALA029) and Melrose (AMELR013) which are all within close proximity to the Borders Railway.</p> <p>Comments are noted regarding new towns. It should be noted that as a result of the complexity of the work involved in preparing the infrastructure and design of any new settlements, there are no new settlements included within the Proposed LDP. It is considered the housing land supply within the LDP is satisfactory without the need to consider a new settlement at this point in time.</p> <p>In respect of satellites to existing towns near Peebles, it is noted that a longer term mixed use site is included within the Proposed LDP at</p>	
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			Cardrona (SCARD002) and a business & industrial site at Eshiels (BESHI001).	
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. <b>(96)</b>	<p>Comments are noted.</p> <p>It should be noted that the Proposed LDP2 provides a range of allocations across the Scottish Borders, in terms of size and location. The LDP cannot set restrictions that allocations can only be for self-build properties.</p> <p>However, the Local Housing Strategy (LHS) looks for opportunities to encourage and promote self or custom builds. It states that SBC's 'Housing in the Countryside' policies encourage small scale development of building groups, which stimulate self-builds.</p>	No action required.
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. <b>(257)</b>	<p>Comments are noted.</p> <p>The Proposed LDP2 includes re-development allocations throughout the Scottish Borders, which are brownfield sites within development boundaries.</p> <p>It should be noted that the Council must allocate sufficient land, to ensure there is enough to meet the</p>	No action required.

			<p>housing land requirement and business &amp; industrial needs for the Scottish Borders. This would not be achievable solely through allocating brownfield land within the development boundaries. Therefore, there is a need to allocate greenfield sites outwith development boundaries, to ensure that the Proposed LDP2 provides sufficient land for housing and business &amp; industrial needs throughout the Scottish Borders.</p>	
<p>Planning for Housing: Question 7</p>	<p>Distribution of housing</p>	<p>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. <b>(197)</b></p>	<p>Comments are noted.</p> <p>The comments refer to the distribution of proposed sites included within the MIR, within Eshiels, Peebles and Cardrona.</p> <p>The options contained within the MIR set out preferred and alternative proposals for housing, mixed use and business &amp; industrial allocations across the Scottish Borders. It should be noted that since the 'MIR Consultation', these have been refined and 15 housing and 1 mixed use allocation are proposed to be taken forward within the Proposed</p>	<p>No action required.</p>

			<p>LDP.</p> <p>It should be noted that the mixed use allocations which were contained within the MIR, in Eshiels (MESH1001 &amp; MESH1002) and Peebles (SPEEB008) have not been taken forward for inclusion within the Proposed LDP. A potential longer term mixed use site has been included within the Proposed LDP for development in Cardrona (SCARD002). The housing allocations (APEEB056) in Peebles and (AEDDL010) in Eddleston have been included within the Proposed LDP. However the housing sites in Eddleston (AEDDL008) and (AEDDL009) have not been included. Likewise, the potential longer term housing sites in Eddleston (SEDDL001) and Peebles (SPEEB009) have not been included either.</p> <p>The proposed allocations included within the LDP provide for a range and choice of sites throughout the Scottish Borders.</p>	
Planning for Housing:	Distribution of housing	The contributor questions why 30% of the proposed preferred/proposed housing units required in this plan in	Comments are noted.	No action required.



<p>Question 7</p>		<p>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. <b>(276)</b></p>	<p>The comments refer to the distribution of proposed sites included within the MIR within Peebles and Eshiels. The contributor states that there are other areas which require investment and regeneration including Walkerburn, Galashiels and Hawick.</p> <p>It should be noted that the Proposed LDP provides a range and choice of allocations throughout the whole Scottish Borders.</p> <p>In respect of Walkerburn, there are already two existing housing allocations within the adopted LDP (AWALK005 &amp; TW200), alongside a redevelopment allocation (zR200). It should be noted that it is proposed to carry these sites forward into the Proposed LDP.</p> <p>In respect of Galashiels, the Proposed LDP includes a housing site (AGALA029) and a business and industrial allocation (BGALA006). The existing undeveloped allocations are proposed to be carried forward into the Proposed LDP.</p>	
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			<p>In respect of Hawick, the Proposed LDP includes a housing site (AHAWI027), two business and industrial sites (BHAWI003 &amp; BHAWI004) and two redevelopment sites (RHAWI017 &amp; RHAWI018).</p> <p>It is considered that these allocations ensure that a variety of sites are provided across the Scottish Borders for development, for a range of uses.</p>	
<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. <b>(155)</b></p>	<p>The LDP provides a wide range of housing/business land options within these towns and a key theme throughout the LDP is the promotion of sustainability and high quality placemaking and design.</p>	<p>No action required.</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</p>	<p>Comments are noted.</p> <p>The MIR was prepared based upon the housing land requirements set out within the SESPlan Proposed Plan, which was derived from the HNDA 2015. This was in accordance with the SESPlan Housing</p>	<p>No action required.</p>

		<p>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"> <li>• A large number of sites have been in the HLA 10 years or more;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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</li> </ul>	<p>Background Paper (October 2016), which set out the background, process and justification for the housing supply targets and housing land requirement.</p> <p>In respect of the HLA programming and the effective housing land supply, it should be noted that an estimate of the timescale for delivery of housing projects has been continually difficult due to the downturn in the housing market and drop in housing development nationally. The programming of sites within the audit can only be a reasonable expression of what can be developed within the time periods and there is a significant degree of uncertainty beyond years 2 and 3. It should be noted that as part of the HLA process, local/national developers and land owners with an interest in sites included within the audit have been contacted to obtain their input into the programming process and to identify any relevant constraints. Where this information has been received, it has been</p>	
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		<p>application, this reduces their chance of becoming truly effective over the planner period;</p> <ul style="list-style-type: none"> <li>• 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 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;</li> <li>• 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;</li> <li>• 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.</li> </ul> <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</p>	<p>incorporated into the audit report.</p> <p>It should be noted that as part of the Proposed Plan process, a review of existing allocations within the adopted LDP was undertaken. Letters were sent out to owners of longstanding allocated sites requesting details of commitments to ensure development is likely to progress. The responses were taken into consideration in the production of the MIR. As a result, 6 sites are proposed for de-allocation (including a re-allocation to business &amp; industrial use) as part of the Proposed Plan process. There are 6 housing sites proposed for inclusion within the Proposed LDP within the Berwickshire HMA. It is considered that the undeveloped sites being carried forward, as well as the new allocations are sufficient for the Proposed LDP period.</p> <p>It is noted that a number of sites have been in the audit 10 years or more. However, again re-iterating the above point, the completions have</p>	
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		<p>housing in locations where the market wants to deliver, and most importantly do not provide development opportunities for Galashiels. <b>(129)</b></p>	<p>dropped since the recession and a number of local builders have ceased trading. This has resulted in a number of sites stalling or being delayed in recent years.</p> <p>It is considered that the Proposed LDP, between new allocations and allocations being carried over from the adopted LDP, does provide a range and choice of sites throughout the Scottish Borders. A recent mixed use allocation was brought forward in Tweedbank as part of the Housing SG, with an indicative site capacity for 300 units. As discussed above, it is increasingly difficult to programme which sites are likely to come forward, therefore the programming is only a reasonable expression of what can be developed within the time periods.</p>	
<p>Planning for Housing: Question 7</p>	<p>Historical completions</p>	<p>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. <b>(129)</b></p>	<p>Comments are noted.</p> <p>In respect of the HLA programming and the effective housing land supply, it should be noted that an estimate of the timescale for delivery of housing projects</p>	<p>No action required.</p>

			<p>has been continually difficult due to the downturn in the housing market and drop in housing development nationally. The programming of sites within the audit can only be a reasonable expression of what can be developed within the time periods and there is a significant degree of uncertainty beyond years 2 and 3.</p> <p>It should be noted that as part of the HLA process, local/national developers and land owners with an interest in sites included within the audit have been contacted to obtain their input into the programming process and to identify any relevant constraints. Where this information has been received, it has been incorporated into the audit report.</p>	
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'. <b>(318)</b>	<p>Comments are noted.</p> <p>Scottish Planning Policy (SPP) requires Councils to identify a generous supply of land for housing within all housing market areas, across a range of tenures, maintaining a 5 year supply</p>	No action required.

			<p>of effective housing land at all times. The supply of land (established housing land supply) is monitored annually through the Housing Land Audit process (HLA).</p> <p>Therefore, Council's must ensure that the established housing land supply is sufficient to meet the housing land requirement for 10 years beyond the date of adoption.</p> <p>Paragraph 5.12 makes reference to the fact that taking into consideration the established housing land supply, low completion rate and low housing land requirements within the Proposed SESPlan, it is anticipated that the Proposed LDP is unlikely to require a significant number of new housing allocations.</p> <p>Further to the 'MIR Consultation', 15 housing allocations and 1 mixed use allocation are included within the Proposed LDP, totalling 567 additional units. These allocations will provide additional flexibility to the existing established housing land supply.</p>	
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<p>Planning for Housing: Question 7</p>	<p>Housing land supply</p>	<p>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. <b>(7)</b></p>	<p>Comments are noted.</p> <p>The MIR was prepared based upon the housing land requirement set out within the SESPlan Proposed Plan, which was derived from the HNDA 2015. This was in accordance with the SESPlan Housing Background Paper (October 2016), which set out the background, process and justification for the housing supply targets and housing land requirements.</p> <p>The current SDP was approved in June 2013. However, the proposed SDP which was intended to replace SDP 2013 was rejected by Scottish Ministers on the 16<sup>th</sup> May 2019. QC advice was that, whilst out of date, SDP 2013 remains the approved Strategic Plan and must therefore continue to be referred to. However advice also stated that whilst the proposed SDP was rejected there are elements of the supporting technical papers and documents which helped guide the proposed SDP and incorporate more up to date positions, which should be</p>	<p>No action required.</p>
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			<p>considered as material considerations. HNDA2 is at present the most up to date and therefore reliable assessment of housing need and demand in the SESPlan area.</p> <p>Appendix 2 of the Proposed Plan and the Housing Technical Note set out the housing land requirement and contributions towards the requirement for the Scottish Borders. The housing supply target and housing land requirement are informed by the HNDA2.</p>	
<p>Planning for Housing: Question 7</p>	<p>Housing land supply</p>	<p>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. <b>(10)</b></p>	<p>Comments are noted.</p> <p>It should be noted that as part of the Proposed LDP, the existing allocations in the adopted LDP were subject to review. In line with national planning policy, in preparing the new LDP, it is important that allocated sites are considered to be deliverable. This is particularly relevant to allocated sites which encompass an element of housing, as there is little point in having sites allocated for housing which are recognised within the Council's housing land</p>	<p>No action required.</p>

			<p>supply, if in reality such sites may never be developed.</p> <p>A review of the existing allocations within the adopted LDP was undertaken. Letters were sent out to owners of longstanding allocated sites requesting details of commitments to ensure development is likely to progress. The responses were taken into consideration in the production of the MIR.</p> <p>As a result, the Proposed LDP proposes to de-allocate 6 sites (including a re-allocation to business &amp; industrial use), totalling 108 units.</p>	
<p>Planning for Housing: Question 7</p>	<p>Housing land supply</p>	<p>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.</p> <p>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 Examination (relating to the HNDA backlog).</p> <p>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</p>	<p>Comments are noted.</p> <p>The MIR was prepared based upon the housing land requirement set out within the SESPlan Proposed Plan, which was derived from the HNDA 2015. This was in accordance with the SESPlan Housing Background Paper (October 2016), which set out the background, process and justification for the housing supply targets and housing land requirements.</p>	<p>No action required.</p>

		<p>where people want to live and where they wish to build. <b>(114)</b></p>	<p>The comments regarding the status of SESPlan 2 are acknowledged. The current SDP was approved in June 2013. However, the proposed SDP which was intended to replace SDP 2013 was rejected by Scottish Ministers on the 16<sup>th</sup> May 2019. QC advice was that, whilst out of date, SDP 2013 remains the approved Strategic Plan and must therefore continue to be referred to. However advice also stated that whilst the proposed SDP was rejected there are elements of the supporting technical papers and documents which helped guide the proposed SDP and incorporate more up to date positions, which should be considered as material considerations. HNDA2 is at present the most up to date and therefore reliable assessment of housing need and demand in the SESPlan area.</p> <p>Appendix 2 of the Proposed Plan and the Housing Technical Note set out the housing land requirement and contributions towards the requirement for the Scottish</p>	
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			Borders. The housing supply target and housing land requirement are informed by the HNDA2.	
Planning for Housing: Question 7	Housing land supply	<p>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.</p> <p>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)</p>	<p>Comments are noted.</p> <p>The MIR was prepared based upon the housing land requirement set out within the SESPlan Proposed Plan, which was derived from the HNDA 2015. This was in accordance with the SESPlan Housing Background Paper (October 2016), which set out the background, process and justification for the housing supply targets and housing land requirements.</p> <p>The comments regarding the status of SESPlan 2 are acknowledged. The current SDP was approved in June 2013. However, the proposed SDP which was intended to replace SDP 2013 was rejected by Scottish Ministers on the 16<sup>th</sup> May 2019. QC advice was that, whilst out of date, SDP 2013 remains the approved Strategic Plan and must therefore continue to be referred to. However advice also stated that whilst the proposed SDP was rejected</p>	No action required.

			<p>there are elements of the supporting technical papers and documents which helped guide the proposed SDP and incorporate more up to date positions, which should be considered as material considerations. HNDA2 is at present the most up to date and therefore reliable assessment of housing need and demand in the SESPlan area.</p> <p>Appendix 2 of the Proposed Plan and the Housing Technical Note set out the housing land requirement and contributions towards the requirement for the Scottish Borders. The housing supply target and housing land requirement are informed by the HNDA2.</p>	
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</p>	<p>Comments are noted.</p> <p><u>Housing</u> The MIR was prepared based upon the housing land requirement set out within the SESPlan Proposed Plan, which was derived from the HNDA 2015. This was in accordance with the SESPlan Housing Background Paper (October 2016), which set out the</p>	No action required.

		<p>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"> <li>• There is not considered to be a five year effective land supply and</li> <li>• 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.</li> </ul> <p>The main points raised in the submission are outlined below;</p> <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</p>	<p>background, process and justification for the housing supply targets and housing land requirements.</p> <p>The comments regarding the status of SESPlan 2 are acknowledged. The current SDP was approved in June 2013. However, the proposed SDP which was intended to replace SDP 2013 was rejected by Scottish Ministers on the 16<sup>th</sup> May 2019. QC advice was that, whilst out of date, SDP 2013 remains the approved Strategic Plan and must therefore continue to be referred to. However advice also stated that whilst the proposed SDP was rejected there are elements of the supporting technical papers and documents which helped guide the proposed SDP and incorporate more up to date positions, which should be considered as material considerations. HNDA2 is at present the most up to date and therefore reliable assessment of housing need and demand in the SESPlan area.</p> <p>Appendix 2 of the Proposed Plan and the Housing</p>	
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		<p>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. <b>(117,128,130,131)</b></p>	<p>Technical Note set out the housing land requirement and contributions towards the requirement for the Scottish Borders. The housing supply target and housing land requirement are informed by the HNDA2.</p> <p>It should be noted that the MIR will not be updated. The next stage in the process will be the public consultation on the Proposed LDP2. Details of the consultation process will be available on the Council's website.</p> <p>It is considered that the Council provides a choice and range of sites throughout the Scottish Borders. This is taking into consideration those new sites proposed as part of the Proposed LDP and those being carried forward from the adopted LDP.</p> <p><u>Review of Sites</u> It should be noted that as part of the Proposed LDP, a review of the existing allocations within the adopted LDP was undertaken. Letters were sent to owners of longstanding allocated sites</p>	
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			<p>requesting details of commitments to ensure development is likely to progress. The responses were taken into consideration in the production of the MIR.</p> <p><u>Effective housing land supply</u></p> <p>In terms of programming the HLA, an estimate of the timescale for delivery of housing projects has been continually difficult due to the downturn in the housing market and drop in housing development nationally. The programming of sites within the HLA can only be a reasonable expression of what can be developed within the time periods and there is a significant degree of uncertainty beyond years 2 and 3. It should be noted that the MIR was based on the 2018 HLA. The methodology for monitoring the 5 year effective housing land supply is set out within Appendix 2 of the adopted LDP. This methodology was subject to Examination and the Reporter made no changes to it. Based on this methodology, the 2018 HLA states that the Council does</p>	
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			<p>have a 5 year effective housing land supply.</p> <p>In terms of the programming, it should be noted that sites programmed for delivery post year 7 and those sites which are constrained/have an element constrained, are likely due to phasing and marketability reasons.</p>	
<p>Planning for Housing: Question 7</p>	<p>Housing land supply</p>	<p>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. <b>(73)</b></p>	<p>Comments are noted.</p> <p>The MIR was prepared based upon the housing land requirement set out within the SESPlan Proposed Plan, which was derived from the HNDA 2015. This was in accordance with the SESPlan Housing Background Paper (October 2016), which set out the background, process and justification for the housing supply targets and housing land requirements.</p> <p>The current SDP was approved in June 2013. However, the proposed SDP which was intended to replace SDP 2013 was rejected by Scottish Ministers on the 16<sup>th</sup> May 2019. QC advice was that, whilst out of date, SDP 2013 remains the</p>	<p>No action required.</p>

			<p>approved Strategic Plan and must therefore continue to be referred to. However advice also stated that whilst the proposed SDP was rejected there are elements of the supporting technical papers and documents which helped guide the proposed SDP and incorporate more up to date positions, which should be considered as material considerations. HNDA2 is at present the most up to date and therefore reliable assessment of housing need and demand in the SESPlan area.</p> <p>Appendix 2 of the Proposed Plan and the Housing Technical Note set out the housing land requirement and contributions towards the requirement for the Scottish Borders. The housing supply target and housing land requirement are informed by the HNDA2.</p> <p>It is noted that a range of preferred and alternative options were included within the MIR. However, the Proposed LDP ultimately includes one housing allocation within Peebles</p>	
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			<p>(APEEB056). Peebles is a town with housing market interest and the LDP process sought to identify options or housing allocations. However, due to a number of constraints e.g topography, requirement for new bridge across the River Tweed, road infrastructure issues in places and flood risk, this is most challenging. It is considered that the Proposed Plan provides a range and choice of sites throughout the Scottish Borders.</p>	
<p>Planning for Housing: Question 7</p>	<p>Housing land supply</p>	<p>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? <b>(306)</b></p>	<p>Comments are noted.</p> <p>The MIR was prepared based upon the housing land requirement set out within the SESPlan Proposed Plan, which was derived from the HNDA 2015. This was in accordance with the SESPlan Housing Background Paper (October 2016), which set out the background, process and justification for the housing supply targets and housing land requirements.</p> <p>The comments regarding the status of SESPlan 2 are acknowledged. The current SDP was approved in June</p>	<p>No action required.</p>

			<p>2013. However, the proposed SDP which was intended to replace SDP 2013 was rejected by Scottish Ministers on the 16<sup>th</sup> May 2019. QC advice was that, whilst out of date, SDP 2013 remains the approved Strategic Plan and must therefore continue to be referred to. However advice also stated that whilst the proposed SDP was rejected there are elements of the supporting technical papers and documents which helped guide the proposed SDP and incorporate more up to date positions, which should be considered as material considerations. HNDA2 is at present the most up to date and therefore reliable assessment of housing need and demand in the SESPlan area.</p> <p>Appendix 2 of the Proposed Plan and the Housing Technical Note set out the housing land requirement and contributions towards the requirement for the Scottish Borders. The housing supply target and housing land requirement are informed by the HNDA2.</p>	
Planning for	Housing land	The contributor has produced their own report (Appendix	Comments are noted.	

<p>Housing: Question 7</p>	<p>supply and delivery</p>	<p>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. These concerns are outlined below.</p> <p><u>Housing Land Supply</u></p> <p>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></p> <p>The contributor raises the following concerns regarding the effective land supply within the Scottish Borders;</p> <ul style="list-style-type: none"> <li>• Allowance for windfall sites should be excluded from the consideration of effective land supply;</li> <li>• 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;</li> <li>• 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;</li> <li>• SG sites are not all in addition to the effective land supply and there has not been a review of</li> </ul>	<p><u>Housing Figures</u></p> <p>The MIR was prepared based upon the housing land requirement set out within the SESPlan Proposed Plan, which was derived from the HNDA 2015. This was in accordance with the SESPlan Housing Background Paper (October 2016), which set out the background, process and justification for the housing supply targets and housing land requirements.</p> <p>The comments regarding the status of SESPlan 2 are acknowledged. The current SDP was approved in June 2013. However, the proposed SDP which was intended to replace SDP 2013 was rejected by Scottish Ministers on the 16<sup>th</sup> May 2019. QC advice was that, whilst out of date, SDP 2013 remains the approved Strategic Plan and must therefore continue to be referred to. However advice also stated that whilst the proposed SDP was rejected there are elements of the supporting technical papers and documents which helped guide the proposed SDP and</p>	
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		<p>the effectiveness of these sites undertaken;</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul> <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></p> <p>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></p> <p>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> <p><u>Review of Existing Land Supply</u></p> <p>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>incorporate more up to date positions, which should be considered as material considerations. HNDA2 is at present the most up to date and therefore reliable assessment of housing need and demand in the SESPlan area.</p> <p>Appendix 2 of the Proposed Plan and the Housing Technical Note set out the housing land requirement and contributions towards the requirement for the Scottish Borders. The housing supply target and housing land requirement are informed by the HNDA2.</p> <p><u>Effective Housing Land Supply</u></p> <p>All sites with extant planning consent, including windfall sites are included within the housing land audit. Given the rural nature of the Scottish Borders, a large proportion of approvals and completions will be on windfall sites. Therefore, it is considered appropriate to include these within the effective housing land supply. The methodology for monitoring</p>	
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		<p>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></p> <p>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.</p> <p><b>(127)</b></p>	<p>sites. It should be noted as part of the audit process, landowners and developers are sent a developer form and contribute to the programming process. Any comments received are taken on board in the audit process.</p> <p>It should be noted that programming within the audit is an estimate of the timescale for delivery of housing projects and programming is continually difficult due to the downturn in the housing market and drop in housing development nationally. The programming of sites within the audit can only be a reasonable expression of what can be developed within the time periods and there is a significant degree of uncertainty beyond years 2 and 3.</p> <p><u>Review of Sites</u></p> <p>As part of the Proposed Plan process, the Council undertook a review of the existing allocations within the adopted LDP. Letters were sent out to owners of longstanding allocated sites</p>	
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			<p>requesting details of commitments to ensure development is likely to progress. The responses were taken into consideration in the production of the MIR.</p> <p><u>Greenfield Allocations</u> The contributor states that there is an over reliance on brownfield sites within the Scottish Borders. However, it is considered that the Proposed Plan provides a range of sites throughout the Scottish Borders.</p> <p><u>Shortfall in housing within Peebles</u> The comments are noted. Whilst the western area has a considerable amount of undeveloped allocated housing land it should be noted that much of this is within Innerleithen and Walkerburn. Historically Peebles has a vibrant market for housing development and the development industry will continue to seek further land in this area to meet demand. However, due to a number of physical and infrastructure constraints further housing site options are limited. Consequently consultants</p>	
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			<p>were appointed to prepare a study to identify both potential short and long term housing options and their findings have influenced the housing proposals in Tweeddale within the LDP. Ultimately, one housing site in Peebles (APEEB056) is being taken forward within the Proposed Plan.</p>	
<p>Planning for Housing: Question 7</p>	<p>Housing land provision within smaller settlements</p>	<p>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.</p> <p>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. <b>(156, 264)</b></p>	<p>Comments are noted.</p> <p>The LDP2 allocates a range of housing, mixed use, redevelopment and business &amp; industrial sites throughout the Scottish Borders. This includes a range of sites within the smaller settlements. There are a large number of such undeveloped allocations which will be carried over from the adopted LDP.</p> <p>The MIR identified additional sites over and above those being carried forward from the adopted LDP, to provide additional flexibility.</p>	<p>No action required.</p>
<p>Planning for Housing: Question 7</p>	<p>Housing policies</p>	<p>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 home builders to operate and flourish in the region, and we would like to see the inclusion of policies to support these small scale</p>	<p>Comments are noted.</p> <p>The Proposed Plan includes a range of housing allocations throughout settlements across the</p>	<p>No action required.</p>

		<p>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. <b>(306)</b></p>	<p>Scottish Borders. It also includes a range of housing policies.</p> <p>Policy HD1: Affordable Housing Delivery, aims to ensure that new housing development provides an appropriate range and choice of 'affordable' units as well as mainstream market housing.</p> <p>Policy HD2: Housing in the Countryside, aims to encourage a sustainable pattern of development focused on defined settlements in accordance with the need to support existing services and facilities and to promote sustainable travel patterns.</p> <p>Policy HD6: Housing for Particular Needs, aims to ensure the provision of housing for particular needs throughout the Scottish Borders.</p> <p>The Council's Local Housing Strategy (LHS) sets out a vision for the supply, quality and availability of housing within the Scottish Borders. It provides a framework of action, investment and</p>	
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			<p>partnership working to deliver the local priorities and considers all tenures and types of accommodation and reflects both national priorities and local need. The most up to date LHS covers the period 2017 – 2022.</p> <p>It is considered that the policies and the LHS together support the delivery of new housing within the Scottish Borders.</p>	
<p>Planning for Housing: Question 7</p>	<p>Housing Technical Note</p>	<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</p>	<p>Comments are noted.</p> <p><u>Housing Technical Note</u> The comments regarding the Housing Technical Note are noted. An updated Housing Technical Note has been produced and will be presented to Full Council as a background paper, alongside the Proposed LDP.</p> <p><u>Programming HLA</u> In respect of the programming of the HLA, it should be noted that an estimate of the timescale for delivery of housing projects has been continually difficult due to the downturn in the housing market and drop in housing development nationally. The programming</p>	<p>No action required.</p>

		<p>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 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</p>	<p>of sites within the HLA can only be a reasonable expression of what can be developed within the time periods and there is a significant degree of uncertainty beyond years 2 and 3. In terms of the programming, it should be noted that sites programmed for delivery post year 7 and those sites which are constrained/have an element constrained, are likely due to phasing and marketability reasons.</p> <p><u>Windfall Assumptions</u> Comments are noted regarding the windfall assumptions. Windfall sites are sites which come forward unexpectedly and have not been identified through the Plan preparation process. The windfall assumptions were taken from the SESPlan Housing Technical Note 2011 and are outlined within the Housing Technical Note which accompanies the Proposed LDP.</p> <p><u>Demolition Assumptions</u> Comments are noted regarding the demolition assumption. The source of</p>	
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		<p>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.</p> <p><b>(306)</b></p>	<p>this was the SESPlan Urban Capacity Study 2009 and again these are outlined within the Housing Technical Note which accompanies the Proposed LDP.</p> <p><u>Estimated Completions</u> Comments are noted regarding the estimated completions. The Housing Technical Note (MIR consultation), accounted for the estimated completions between (2017/18 and 2020/21) and were calculated using a 2 year completions average from the 2016 and 2017 HLA.</p> <p>It should be noted that an updated Housing Technical Note has been produced which will sit alongside the Proposed Plan. This outlines the updated housing position, taking into consideration the 2019 HLA.</p> <p><u>Housing Position</u> The MIR was prepared based upon the housing land requirement set out within the SESPlan Proposed Plan, which was derived from the HNDA 2015. This was in accordance with the</p>	
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			<p>SESPlan Housing Background Paper (October 2016), which set out the background, process and justification for the housing supply targets and housing land requirements.</p> <p>The comments regarding the status of SESPlan 2 are acknowledged. The current SDP was approved in June 2013. However, the proposed SDP which was intended to replace SDP 2013 was rejected by Scottish Ministers on the 16<sup>th</sup> May 2019. QC advice was that, whilst out of date, SDP 2013 remains the approved Strategic Plan and must therefore continue to be referred to. However advice also stated that whilst the proposed SDP was rejected there are elements of the supporting technical papers and documents which helped guide the proposed SDP and incorporate more up to date positions, which should be considered as material considerations. HNDA2 is at present the most up to date and therefore reliable assessment of housing need and demand in the SESPlan area.</p>	
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			Appendix 2 of the Proposed Plan and the Housing Technical Note set out the housing land requirement and contributions towards the requirement for the Scottish Borders. The housing supply target and housing land requirement are informed by the HNDA2.	
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. <b>(277)</b>	<p>The MIR included a range of preferred and alternative options for development. A number of which were existing potential longer term sites identified within the adopted LDP.</p> <p>The Local Plans continue to identify potential longer term sites for development. This enables the Council to identify preferred areas for future expansion and site assessment work to be undertaken. Furthermore, in the event of a housing shortfall, Policy HD4 allows for the release of identified longer term sites is required.</p>	No action required.
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</p>	Comments are noted in respect of infrastructure, schools and medical facilities. All sites included within the MIR were subject to a full site assessment and	No action required.



		<p>these developments.</p> <p>Contributor 276 asks when is a town deemed overdeveloped in relation to its infrastructure. <b>(247, 251, 276)</b></p>	<p>consultation process (internal and external), including with NHS, Council's Roads Planning Service and Education. The comments were taken on board and site requirements included, where necessary.</p>	
<p>Planning for Housing: Question 7</p>	<p>Local and National house builders – housing delivery</p>	<p>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 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. <b>(156, 264)</b></p> <p>The contributor submitted a background document, highlighting the above, as part of their submission (NHBC: Small house builders and developers). <b>(156)</b></p>	<p>The LDP cannot allocate sites for specific end users and within the LDP there are a number of small scale allocations and infill opportunities which are unlikely to interest national housebuilders and would be more likely to be developed by smaller local businesses.</p>	<p>No action required.</p>
<p>Planning for Housing: Question 7</p>	<p>Location for future housing</p>	<p>The contributor states that housing should be adjacent to existing towns/villages and not spread all over the countryside. <b>(204)</b></p>	<p>Comments are noted.</p> <p>It should be noted that the Proposed LDP allocates a range and choice of housing sites throughout the Scottish Borders, both within and adjacent to the existing development boundaries.</p> <p>Any planning applications for development proposals</p>	<p>No action required.</p>

			outwith development boundaries, would need to comply with the rigorous exceptions criteria contained within the Proposed LDP policies, notably of policy HD2: Housing in the Countryside.	
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). <b>(73)</b>	<p>Comments are noted regarding a new settlement.</p> <p>The sites included within the Proposed LDP are situated in or around existing settlement. In the longer term it may be that ideas come forward for new 'stand alone' settlements in high demand areas. As a result of the complexity of the work involved in preparing the infrastructure and design of any new settlements, there are no new settlements included within the Proposed Plan. However, the Council is open to well thought through proposals of this kind put forward by developers or landowners so that early consideration can begin, although it is considered the allocations within the LDP are sufficient to meet the requirements within the LDP period.</p>	No action required.
Planning for Housing:	Presentation of housing land	The contributor states that they are disappointed at how housing sites and mixed use sites were shown	Comments are noted regarding the housing and	No action required.

Question 7	numbers, MIR content, and Borders Railway	<p>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. <b>(96)</b></p>	<p>mixed use sites layout/presentation within the MIR documents.</p> <p>Comments are noted regarding the provision of services including education and healthcare. As part of the site assessment process, all the sites included within the MIR were subject to internal and external consultation. This included education and NHS. The comments received as part of that process, were taken on board and incorporated within the Proposed Plan.</p> <p>Comments are noted regarding the Borders Railway.</p>	
Planning for Housing: Question 7	Retirement village	<p>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. <b>(90)</b></p>	<p>Comments are noted regarding the shifting demographics within the Scottish Borders.</p> <p>It would not be within the remit of the Proposed LDP to specifically allocate sites for a retirement village. The allocations for housing provide the opportunity for a range of housing (affordable, market, extra care, retirement etc).</p>	No action required.
Planning for	Sheltered	The contributor states that specific plans within LDP2	Comments are noted	No action required.

Housing: Question 7	housing	(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. <b>(197)</b>	regarding the provision for sheltered accommodation.  It would not be within the remit of the Proposed LDP to specifically allocate sites for sheltered housing. The allocations for housing provide the opportunity for a range of housing (affordable, market, extra care, retirement etc). The allocated site at Lowood in Tweedbank has been identified as a possible site for a Care Home.	
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. <b>(222)</b>	Comments are noted.  The Proposed LDP allocates a range and choice of sites for housing within the Scottish Borders. This includes allocations within smaller villages.  Within the countryside, any proposed housing outwith an allocated site will have to comply with the rigorous exceptions criteria contained within the LDP2 policies, notably Policy HD2: Housing in the Countryside.	No action required.
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	Comments are noted.  It should be noted that within the settlement maps for the Proposed LDP, the indicative	No action required.

		unit figures given for the single use Business/Industrial/land use sites. <b>(90)</b>	business and industrial area within mixed use allocations is shown on the map, where possible.	
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. <b>(196)</b>	Comments are noted.  The Proposed Plan continues to allocate a range and choice of sites for housing throughout the Scottish Borders. The Plan cannot allocate for specific types/densities of housing, for example: extra care, affordable etc.  Where certain types of development are proposed, for example affordable housing, there is a relaxation on the developer contributions required.	No action required.
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. <b>(30)</b>	The planning process cannot control the number of applications/proposals on windfall sites annually. The Proposed LDP2 must ensure that there is sufficient land allocated to meet the housing land requirement and takes into consideration a windfall estimation in the calculation.  It is acknowledged that windfall development will vary annually throughout settlements within the	No action required.

			<p>Scottish Borders.</p> <p>Any windfall proposals will continue to be assessed against Policy PMD5: Infill Development, contained within the Proposed LDP.</p>	
<p>Planning for Housing: Question 7</p>	<p>General</p>	<p>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. <b>(240)</b></p>	<p>Disagree strongly. All allocations and policies are established via a rigorous consultation LDP process and planning applications are judged taking account of relevant policies, placemaking and design principles and consultations from technical bodies. Third party comments are welcomed, though these comments are not the sole consideration in judging proposals.</p>	<p>No action required.</p>
<p>Planning for Housing: Question 7</p>	<p>General</p>	<p>The contributor states that there should be no change to the existing plans. <b>(288)</b></p>	<p>Comments are noted.</p>	<p>No action required.</p>
<p>Planning for Housing: Question 7</p>	<p>General</p>	<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</p>	<p>Comments are noted.</p> <p>It should be noted that a number of the allocated sites have a site requirement, stating that a planning brief or masterplan will be undertaken for the site. These are outlined within Appendix 3 of the Proposed Plan.</p>	<p>No action required.</p>

		<p>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. <b>(213)</b></p>	<p>It should be noted that a series of site requirements are attached to all allocations within the Proposed Plan. These take on board advice from consultees from the consultation process. The site requirements are not exhaustive and more specific detailed matters are considered at the planning application stage.</p>	
<p>Planning for Housing: Question 7</p>	<p>General</p>	<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. <b>(185)</b></p> <p>The contributor questions why there is not more emphasis on housing development in Galashiels and the route along the Borders Railway? <b>(283)</b></p>	<p>Comments are noted in respect of Hawick, Kelso, Selkirk and Eyemouth. The Proposed LDP includes a range and choice of housing allocations throughout the Scottish Borders, including the aforementioned settlements.</p> <p>It should be noted that there are a number of housing allocations within the Proposed Plan along the Borders Railway corridor. Furthermore, as part of the Housing SG a mixed use allocation was taken forward in Tweedbank, with an indicative capacity for 300 units.</p>	<p>No action required.</p>
<p>Planning for Housing: Question 7</p>	<p>General</p>	<p>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. <b>(255)</b></p>	<p>Comments are noted.</p> <p>Policy PMD2: Quality Standards, aims to ensure</p>	<p>No action required.</p>

			<p>that all new development, not just housing, is of a high quality and respects the environment in which it is contained. The policy states that all new development will be expected to be of a high quality in accordance with sustainability principles, designed to fit with Scottish Borders townscapes and to integrate with its landscape surroundings. The policy sets out a series of criteria in which proposals will be assessed against.</p>	
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## 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	Proposed Response to Main Issues Raised	Recommendation
Allanton	AALLA001, West of Blackadder Drive	<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. <b>(326)</b></p>	<p>The site (AALLA001) was previously considered at the 'Pre MIR' stage and was not included within the MIR. The site was re-submitted for consideration as part of the 'MIR consultation'. However, it is not considered that any additional or new information has been submitted, which required a re-consultation. Therefore, the conclusion from the 'Pre MIR' stage remains valid.</p> <p>There are a number of constraints within and adjacent to the site. Overall, it is not considered that the proposal would be in keeping with the existing linear settlement pattern evident within Allanton, nor would it respect the character of the existing village or the Conservation Area. There is potential that such an allocation would result in an adverse impact upon the natural and built environment. Furthermore, the Roads Planning Officer cannot support such a proposal.</p> <p>It was concluded that the site should not be included within the Proposed LDP for housing.</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

Cockburnspath	ACOPA007, Land to North of Hoprig Road	<p>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. Not only would this site contribute to the effective housing land supply but would also contribute to the improvement of Cockburnspath overall.</p> <p>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. <b>(132)</b></p>	<p>The site (ACOPA007) was submitted as part of the 'MIR consultation' process. Following a full site assessment, it was concluded that the site should not be included within the Proposed LDP for housing.</p> <p>The adopted LDP states that development into open fields to the west of Cockburnspath should be avoided to maintain the settlement form. Furthermore, the site is separated from the existing houses along the north of Hoprig Road (The Manse, Gayfield &amp; Romanno). Therefore, for these reasons, it is not considered that the site would maintain or respect the existing settlement form of Cockburnspath. The Roads Planning Officer is also unable to support the development of this site for housing.</p> <p>The proposal is for 3-4 self-build units. It should be noted that it is not the purpose of the LDP to identify and allocate single plots for development, only sites with a capacity of five or more units will be allocated. Furthermore there are two large housing allocations within Cockburnspath, totalling 75 units. Therefore, it is considered that the settlement has sufficient housing allocations for the LDP2 period.</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.
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Cockburnspath	ACOPA008, Land to North of Dunglass Park	<p>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.</p> <p>The contributor supports the inclusion of the site and puts forward a number of justifications, summarised below;</p> <ul style="list-style-type: none"> <li>• 3<sup>rd</sup> 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;</li> <li>• In line with Council's direction for future development and the site would bring forward much needed housing to sustain the settlement;</li> <li>• 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;</li> <li>• Would help LDP2 to plan strategically for the long term growth of Cockburnspath. It would also channel development in the most logical direction;</li> <li>• Would support key outcome 2 &amp; 9 of the</li> </ul>	<p>The site (ACOPA008) was submitted as part of the 'MIR consultation' process. Following a full site assessment, it was concluded that the site should not be included within the Proposed LDP for housing.</p> <p>Although the preferred area for future expansion lies to the north of Cockburnspath, it is noted that there are currently 2 housing allocations (BCO4B &amp; BCO10B). Given that (BCO4B) remains undeveloped, it is considered that the allocation of any additional land to the north, at this time, would be premature. It is not considered that additional land to the north should be released until such time that (BCO4B) is near completion. This would avoid developing an area to the north, which would effectively be separated from the rest of Cockburnspath.</p> <p>The applicant states within their submission, that this site could substitute the existing allocation (BCO10B) to the south. However, this does not address the issue outlined above regarding the fact that (BCO4B) remains undeveloped.</p> <p>The applicant questions the effectiveness of the existing two housing allocations, stating that they</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.
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		<p>LDP; and</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul> <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. <b>(132)</b></p>	<p>have not delivered. However, it should be noted that since the recession, overall completion rates for the whole of the Scottish Borders have been low for marketability reasons.</p> <p>In conclusion, it is considered that Cockburnspath has sufficient housing allocations for the LDP2 period.</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. <b>(132)</b></p>	<p>The site (SBCOP001) was submitted as part of the 'MIR consultation' process. Following a full site assessment, it was concluded that the development boundary should not be amended.</p> <p>Although the proposal is for a development boundary amendment, the site is currently an open field, therefore this would allow proposals to essentially be assessed against the infill policy (Policy PMD5: Infill Development). It is not considered that allowing the development boundary amendment would maintain or respect the existing settlement form of Cockburnspath.</p>	It is recommended that the Council agree not to amend the development boundary within the Proposed Local Development Plan.

			<p>Although the Roads Planning Officer did not raise an objection to the development boundary amendment, they raised concerns regarding the potential development of this site in the future. It should be noted that a separate site assessment was undertaken for housing on (ACOPA007), which forms the western part of this site. As part of the consultation, the Roads Planning Officer stated that they cannot support housing on (ACOPA007).</p> <p>It is not considered appropriate to expand a development boundary merely in order to provide infill opportunities within the settlement itself, without a formal allocation.</p> <p>It should be noted that there are two large housing allocations within Cockburnspath and it is considered that these are sufficient for the LDP2 period.</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</p>	<p>The site (ACOLH005) was previously considered at the 'Pre MIR' stage and was not included within the MIR. The site has been re-submitted for consideration, as part of the 'MIR consultation'. However, it is not considered that any additional or new information has been submitted, which required a re-consultation. Therefore, the</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>

		<p>process to help create a policy more suited to settlements like Coldingham Sands than the <i>'housing in the countryside'</i> policy.</p> <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. <b>(327)</b></p>	<p>conclusion from the 'Pre MIR' stage remains valid.</p> <p>The site occupies a countryside location. Ultimately, the allocation of a housing site at such a location, would not comply with the principles of the LDP. It is therefore not appropriate to allocate this site for housing. Should the applicant wish to pursue this matter, a planning application could be submitted for consideration against Policy HD2: Housing in the Countryside.</p> <p>It was concluded that the site should not be included within the Proposed LDP for housing.</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</p>	<p>The site (ACOLD011) was allocated for housing as part of the Housing SG and was not included within the MIR.</p> <p>The Housing SG was subject to referral to the Scottish Government, who raised no objection to the allocation. As part of the Housing SG, the site was subject to internal &amp; external consultation and a full site assessment. As a result, a number of site requirements are attached to the allocation, including; flood risk, boundary treatment, provision of open space, landscaping, buffer areas, vehicular access, paths/cycle links, Transport</p>	It is recommended that the Council agree to the retention of this allocation within the Proposed Local Development Plan.

	<p>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</p>	<p>Assessment, ecology, archaeology, landscape and play provision.</p> <p>The site is prime quality agricultural land but that does not prevent the development of it. There is a very large area of this designation surrounding Coldstream and it is not considered that its loss will be of any great significance in the circumstances. It should be noted that this site is already allocated for housing and that the adjoining site (BCOLD001) is also located within an area of prime quality agricultural land.</p> <p>The LDP states that the future direction of growth within Coldstream is to the north of the town, adjacent to the existing business &amp; industrial allocation.</p> <p>It is not considered appropriate to remove this allocation from the Proposed LDP, given its recent allocation.</p>	
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		<p>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</p>		
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		<p>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"><li>- 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;</li><li>- 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;</li><li>- Deliver of housing in this location will necessitate the creation of artificial boundaries;</li><li>- 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;</li><li>- 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</li></ul>		
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		<ul style="list-style-type: none"> <li>- Development of an access road through the planted boundary is contrary to Policy EP3.</li> </ul> <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"> <li>- Prospective residents gaining access when not permitted;</li> <li>- Mixing with delivery traffic/site operations;</li> <li>- Being subject to noise; and</li> <li>- Being subject to odour/air quality issues.</li> </ul> <p>Farming operations and industrial use do not compliment housing allocations sensitively and conflicts will arise. <b>(81)</b></p>		
Coldstream	ACOLD014, Hillview North I (Phase 2)	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	The comments are noted.  The site (ACOLD014) was previously considered at the 'Pre MIR' stage and was included within the MIR as an alternative option for	It is recommended that the Council agree to allocate this site within the Proposed LDP and introductory text

		<p>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</p>	<p>housing development. The site is ultimately included within the Proposed LDP.</p> <p>It should be noted that the site is identified within the adopted LDP as an option for longer term housing (SCOLD001).</p> <p>The southern part of this site was formally allocated for housing as part of the Housing SG (ACOLD011). Therefore, it is considered that the site (ACOLD014), along with the existing allocation (ACOLD011) are suitable for housing and are deliverable.</p> <p>In respect of access, the following site requirements are attached to the allocation; <i>'Ensure connectivity to the allocated housing site (ACOLD011) to the south and adjacent employment allocation (BCOLD001) to the east and future links to the longer term site (SCOLD002) to the west'</i> and <i>'Vehicular access will be taken from the existing allocation (ACOLD011) to the south. A Transport Assessment is required for any development'</i>. It is considered that the site requirements address the concerns raised regarding access. This will ensure connectivity between the housing sites, business &amp; industrial allocation to the east</p>	<p>within Volume 2 confirms the need for developers to contact Scottish Water and SEPA at an early stage to identify any potential water/drainage issues to be addressed.</p>
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		<p>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 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</p>	<p>and any potential future development to the west.</p> <p>SEPA were consulted as part of the site assessment process and their advice has been taken on board and incorporated within the site requirements. The following site requirement is attached; <i>'Investigation of any potential flood risk within the site and mitigation where required'</i>. SEPA provided additional comments as part of the 'MIR Consultation' stage and did not raise any concerns regarding the proposed site requirement.</p> <p>It is noted that the site is located within an area of prime quality agricultural land. However, this does not prevent a site being allocated for development. It should be noted that the adjoining sites (ACOLD011) and (BCOLD001) are also located within prime quality agricultural land. There is a large area of this designation surrounding Coldstream and it is not considered that its loss will be of any great significance in the circumstances.</p> <p>The comments are noted in respect of the distance from the town centre and amenities. However, the site is already identified within the adopted LDP as the preferred area for future growth and development within</p>	
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		<p>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"> <li>- 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;</li> <li>- 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;</li> <li>- Deliver of housing in this location will necessitate the creation of artificial boundaries;</li> <li>- It is unclear how creation of path/cycle linkages will be provided. This is a key issue,</li> </ul>	<p>Coldstream.</p> <p>The comments regarding roads infrastructure are noted. The Roads Planning Officer was consulted as part of the site assessment process and their comments have been taken on board within the site requirements. It is considered that the site requirements satisfactorily address the comments raised by the Roads Planning Officer.</p> <p>The comments regarding infrastructure are noted. Scottish Water and SEPA were consulted as part of the site assessment process and their comments have been taken on board within the site requirements. The following site requirements are attached in respect of the WWTW and WTW: <i>'Water Impact Assessment is required, to establish what impact the development has on the existing network'</i> and <i>'Drainage Impact Assessment is required, to establish what impact the development has on the existing network'</i>. Furthermore, the introductory text within Volume 2 confirms the need for developers to contact Scottish Water and SEPA at an early stage to identify any potential water/drainage issues to be addressed.</p>	
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		<p>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;</p> <ul style="list-style-type: none"> <li>- 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</li> <li>- Development of an access road through the planted boundary is contrary to Policy EP3.</li> </ul> <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"> <li>- Prospective residents gaining access when not permitted;</li> <li>- Mixing with delivery traffic/site operations;</li> <li>- Being subject to noise; and</li> </ul>	<p>The comments in relation to the placemaking considerations, ageing population and distance from amenities/services are noted. The site is currently identified within the adopted LDP for longer term housing development. The area to the north of Coldstream is currently identified within the LDP as the preferred area of growth and expansion. It is considered that the existing site requirements satisfactorily address comments previously raised by consultees.</p> <p>The comments are noted in respect of the path/cycle linkages. The following site requirement is attached to the allocation <i>'Path/cycle linkages to the existing network within Coldstream, particularly linking new open spaces'</i>.</p> <p>The comment in respect of the access road through the planted boundary is noted. However, the housing site (ACOLD011) is already allocated within the LDP. Therefore, the principle of the access has already been established through the allocation.</p> <p>The comments are noted in respect of funding and marketing. Scottish Planning Policy (SPP) states that a generous supply of housing land for</p>	
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		<p>- Being subject to odour/air quality issues.</p> <p>Farming operations and industrial use do not compliment housing allocations sensitively and conflicts will arise. <b>(81)</b></p>	<p>each housing market area within the plan period should be provided to support the achievement of the housing land requirement across all tenures, maintaining at least a 5 year supply of effective housing land at all times. The allocations within the Proposed LDP are to meet the housing land requirement up until 10 years post the adoption of the Plan (2030/31). In allocating this site, it ensures that there is an adequate supply of housing land within Coldstream for within the Plan period and beyond.</p> <p>The comments are noted in respect of land use conflicts. However, as stated previously this site is currently identified within the adopted LDP as a longer term housing site. Furthermore, the housing allocation (ACOLD011) and business &amp; industrial allocation (BCOLD001) are already allocated within the adopted LDP. Within the Scottish Borders there are many examples of residential developments in proximity to working farms. This is not a reason for opposing this proposal and a substantial woodland buffer is proposed between the site and the farm. Furthermore, a site requirement is proposed requesting that appropriate planting should be carried out along the northern part</p>	
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			<p>of the site to give adequate screening from the working farm to the north and the access of it.</p> <p>It is considered that the site requirements satisfactorily address any comments raised by consultees. It should be noted that although the site to the south (ACOLD011) was recently allocated, it is considered that there are advantages to developing this site (ACOLD014) and the existing allocation (ACOLD011) together. This would allow the development of the two sites to be considered together, in respect of any master planning/layout and connectivity.</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"> <li>• 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);</li> <li>• 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</li> </ul>	<p>The comments from SNH are noted.</p> <p>The site was included within the MIR as an alternative option for housing development and ultimately the site has been included within the Proposed LDP.</p> <p>SNH were previously consulted at the 'Pre MIR' stage and their advice was taken on board and incorporated within the site requirements. The following site requirements were attached;</p> <ul style="list-style-type: none"> <li>• <i>'Protection of existing boundary features (hedgerows and trees), where possible;</i></li> <li>• <i>'New structure</i></li> </ul>	It is recommended that the Council agree to allocate this site within the Proposed Local Development Plan.



		<p>providing setting and shelter for users; and</p> <ul style="list-style-type: none"> <li>• Open space should provide multiple benefits and be linked into wider habitat and active travel networks. <b>(213)</b></li> </ul>	<p><i>planting/landscaping should be planned, to improve the setting of the site and to establish a framework for delivery alongside (ACOLD011) to the south. This should include structure planting along the north east and south west boundaries, which would provide a settlement edge. Existing shelter belts should be retained and enhanced with additional planting’;</i></p> <ul style="list-style-type: none"> <li>• <i>‘The long term maintenance of landscaped areas must be addressed’;</i></li> <li>• <i>‘Provision of open space to serve the site and wider settlement, which could link into the wider habitat and active travel networks. Locate open space along the eastern boundary of the site to provide a buffer area between this area and the employment allocation (BCOLD001)’.</i></li> </ul> <p>It is considered that the attached site requirements address the points raised by SNH.</p>	
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</p>	<p>The comments from SEPA are noted.</p> <p>The site is currently identified within the adopted LDP for potential longer term housing development</p>	It is recommended that the Council agree to allocate this site within the Proposed LDP and include reference is

		<p>investigated further and it is recommended that contract is 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. <b>(119)</b></p>	<p>(SCOLD001). The site was included within the MIR as an alternative option for housing and is ultimately included within the Proposed LDP.</p> <p>SEPA and Scottish Water were previously consulted at the 'Pre MIR' stage and their advice was taken on board and incorporated within the site requirements. The following site requirement is attached in respect of potential flood risk; <i>'Investigation of any potential flood risk within the site and mitigation where required'</i>.</p> <p>In respect of the foul water comments, SEPA and Scottish Water were previously consulted at the 'Pre MIR' stage and their advice was taken on board and incorporated within the site requirements. The following site requirements are attached in respect of the WWTW and WTW: <i>'Drainage Impact Assessment is required, to establish what impact the development has on the existing network'</i> and <i>'Water Impact Assessment is required, to establish what impact the development has on the existing network'</i>.</p> <p>It is noted that SEPA state foul water must connect to the existing Scottish Water foul network. Therefore, it is recommended that</p>	<p>included within the introductory text within Volume 2 confirming the need for developers to contact Scottish Water and SEPA at an early stage to identify any potential water/drainage issues to be addressed.</p>
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			<p>reference is made in the introductory text within Volume 2 confirming the need for developers to contact Scottish Water and SEPA at an early stage to identify any potential water/drainage issues to be addressed.</p> <p>It is considered that the above satisfactorily addresses the comments raised by SEPA.</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"> <li>• 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;</li> <li>• 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;</li> <li>• The contributor states that the site is not visible from Duns Castle, nor if Duns Castle visible from the site;</li> <li>• Appreciate that the site is located within an area with potential historic interest. Therefore, comfortable that archaeological investigations should be placed as a condition;</li> <li>• Do not accept that development of this site would have a detrimental visual impact. It would simply improve symmetry to the existing development on the opposite side</li> </ul>	<p>The site (ADUNS027) was previously considered at the 'Pre MIR' stage and was not included within the MIR. The site was re-submitted for consideration, as part of the 'MIR consultation'. It is acknowledged that the agent has submitted a response to the points raised in the previous site assessment conclusion. However, it is not considered that any additional or new information was submitted which required a re-consultation. Therefore, the conclusion from the previous MIR stage remains valid.</p> <p>There are a number of constraints identified within and around the site including: prime quality agricultural land, surface water runoff, location within 'Duns Castle' Designed Landscape, location within 'Duns' SBC Designed Landscape, constrained within the Landscape Capacity Study, number of Historic</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

		<p>of Preston Road, therefore not elongating the town any further than it already does at present;</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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</li> <li>• 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. <b>(12)</b></li> </ul>	<p>Environment Records within the site, site lies adjacent to the Category C listed building 'Wellfield Cottage' and archaeology investigations are required.</p> <p>In respect of landscape and visual impacts, the bank rises up steeply and therefore any development would be quite a prominent addition to the settlement in terms of visual impact. It is therefore doubtful how well the site would integrate within the landscape. A slightly smaller site boundary was considered as part of the Local Plan Inquiry, where the Reporter endorsed the Council's assessment that its development would have an adverse impact on the views, character and setting of Duns and would unnecessarily elongate the town away from the local services and facilities.</p> <p>It was concluded that the site should not be included within the Proposed LDP for housing.</p>	
Gavinton	AGAVI002, Land at Langton Glebe	<p>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</p>	<p>The site (AGAVI002) was submitted as part of the 'MIR consultation' process. Following a full site assessment, it was concluded that the site should not be included within the Proposed LDP for housing.</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>

		includes a Supporting Statement alongside the proposed allocation. <b>(325)</b>	<p>The site was previously considered as part of the adopted LDP and was not taken forward. There are a number of constraints identified within and around the site including: flooding; waterbody within and forming part of the site boundary; surface water hazard; archaeology; Transport Assessment; Water Impact Assessment &amp; WWTW capacity. The Roads Planning Officer also raised concerns regarding the access into this site.</p> <p>Gavinton is a small planned estate village and it is considered that the site in question is incongruous to the character and size of Gavinton, due to its scale and location. It is considered that the scale and layout of the site would be at odds with the planned linear layout of the village and would significantly alter the character. Furthermore, there is the potential that the scale of the site may make Gavinton visible from the road to the east. Gavinton currently has a sizeable undeveloped housing allocation (BGA1), with an indicative site capacity for 45 units.</p> <p>It is concluded that the site should not be included within the Proposed LDP for housing.</p>	
Gordon	AGORD004, Land at Eden	The contributor raises the following concerns regarding the preferred option for housing in	Comments are noted.	It is recommended that the Council

	Road	<p>Gordon;</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• Very damp field and substantial drainage would be required;</li> <li>• Would be imperative that all hedging and trees are retained, and their number enhanced to maintain the rural edge of the village;</li> <li>• 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</li> <li>• Considers the site more appropriate for 12 houses. <b>(138)</b></li> </ul>	<p>The site (AGORD004) was previously considered at the 'Pre MIR' stage and was included within the MIR as a preferred option for housing, with an indicative capacity for 25 units.</p> <p>The comments regarding sewerage and drainage are noted. Scottish Water, the Council's Flood &amp; Coastal Management Team and SEPA were previously consulted at the 'Pre MIR' stage. Their comments were taken on board and the following site requirement is attached to the allocation, <i>'Early engagement with Scottish Water, in respect of the WWTW'</i>.</p> <p>The comments regarding the hedging and trees are noted. SNH and the Council's Landscape Officer were previously consulted at the 'Pre MIR' stage. Their comments were taken on board and the following site requirements are attached to the allocation, <i>'Protection of existing boundary features, including the existing trees on the verge/fence line, where possible' and 'Landscaping to assist with integrating the development into the location. The long term maintenance of any landscaped areas must be addressed'</i>.</p> <p>The comments regarding the</p>	<p>agree to allocate this site within the Proposed Local Development Plan.</p>
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			<p>density of housing are noted. It should be noted that the site capacities are only indicative. The final layout and design of the site would be assessed at the planning application stage.</p> <p>It is concluded that there were no insurmountable reasons to oppose the site and it should be included within the Proposed LDP for housing.</p>	
Gordon	AGORD004, Land at Eden Road	<p>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.</p> <p>Foul water must connect to existing SW foul network. <b>(119)</b></p>	<p>The site was included within the MIR as a preferred option for housing development.</p> <p>The comments in respect of the co-location area noted.</p> <p>In respect of foul water comments, SEPA and Scottish Water were previously consulted at the 'Pre MIR' stage and their advice was taken on board and incorporated within the site requirements. The following site requirement is attached; <i>'Early engagement with Scottish Water, in respect of the WWTW'</i>. It is noted that SEPA state foul water must connect to the existing Scottish Water foul network. Therefore, it is recommended that reference is made in the introductory text within Volume 2 confirming the need for developers to contact Scottish Water and SEPA</p>	<p>It is recommended that the Council agree to allocate this site within the Proposed Local Development Plan and the introductory text within Volume 2 confirms the need for developers to contact Scottish Water and SEPA at an early stage to identify any potential water/drainage issues to be addressed.</p>

			<p>at an early stage to identify any potential water/drainage issues to be addressed. It is considered that the above satisfactorily addresses the comments raised by SEPA.</p> <p>It is concluded that the site should be included within the Proposed LDP for housing.</p>	
Grantshouse	AGRAN004, Land North of Mansefield	<p>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.</p> <p>Foul water must be connected to the existing Scottish Water foul network. <b>(119)</b></p>	<p>The site was included within the MIR as a preferred option for housing development.</p> <p>The comments in respect of surface water runoff and foul water are noted. SEPA and Scottish Water were previously consulted at the 'Pre MIR' stage and their advice was taken on board.</p> <p>The following site requirement is attached in respect of surface water; <i>'Consideration must be given to surface runoff issues, to ensure adequate mitigation'</i>.</p> <p>In respect of the foul water comments, the following site requirement is attached; <i>'Early contact with Scottish Water in respect of WWTW'</i>. It is noted that SEPA state foul water must connect to the Scottish Water foul network. Therefore, it is recommended that reference is made in the introductory text within Volume 2</p>	<p>It is recommended that the Council agree to allocate this site within the Proposed LDP and the introductory text within Volume 2 confirms the need for developers to contact Scottish Water and SEPA at an early stage to identify any potential water/drainage issues to be addressed.</p>



			<p>confirming the need for developers to contact Scottish Water and SEPA at an early stage to identify any potential water/drainage issues to be addressed. It is considered that the above satisfactorily addresses the comments raised by SEPA.</p> <p>It is concluded that the site should be included within the Proposed LDP for housing.</p>	
Greenlaw	AGREE008, Halliburton Road	<p>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.</p> <p>Foul water must connect to the existing Scottish Water foul network. <b>(119)</b></p>	<p>The site was included within the MIR as an alternative option for housing development.</p> <p>The comments regarding the surface water runoff and foul drainage are noted. SEPA and Scottish Water were previously consulted at the 'Pre MIR' stage and their advice was taken on board.</p> <p>In respect of the foul water comments, it is noted that SEPA state foul water must connect to the existing Scottish Water foul network. This issue was raised by SEPA on a number of other sites too. It is recommended that reference is made to foul water disposal within Volume 2 of the Proposed LDP for other sites.</p> <p>It should be noted that there are no insurmountable constraints to the development of this site. However,</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.

			<p>there are a number of existing allocations within Greenlaw and it is not considered that there is a need for an additional housing allocation as well as this site.</p> <p>However, it is concluded that the site should not be included within the Proposed LDP for housing.</p>	
Greenlaw	AGREE009, Poultry Farm	<p>SNH note the proximity of the River Tweed SAC and advise that this site should be included in the HRA of the plan.</p> <p>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. <b>(213)</b></p>	<p>The site was included within the MIR as a preferred option for housing development.</p> <p>The comments regarding the proximity to the River Tweed SAC are noted. The following site requirement is attached in respect of the River Tweed SAC; '<i>Mitigation to ensure no significant effect on River Tweed SAC/SSSI</i>'.</p> <p>The comments regarding the HRA are noted and it is confirmed that the site will be included within the HRA.</p> <p>The comments regarding a site development brief are noted. However, it is acknowledged that this site already has extant planning consent for housing. Therefore, it is not considered that a specific site development brief would be necessary. Any specific details would be dealt with through the planning application process.</p>	It is recommended that the Council agree to allocate this site within the Proposed Local Development Plan.

			<p>It is considered that the above satisfactorily address the comments raised by SNH.</p> <p>It is concluded within the site should be included within the Proposed LDP for housing.</p>	
Greenlaw	AGREE009, Poultry Farm	<p>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.</p> <p>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.</p> <p>There is a surface water hazard identified.</p> <p>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. <b>(119)</b></p>	<p>The site was included within the MIR as a preferred option for housing development.</p> <p>The comments regarding the proximity to the Greenlaw STW and co-location issues are noted. It is considered that any odour complaints would be dealt with by the Council's Environmental Health team.</p> <p>The comments regarding FRA and surface water are noted. SEPA were previously consulted at the 'Pre MIR' stage and their advice was taken on board. The following site requirement was attached in respect of flood risk as part of the MIR; <i>'Flood Risk Assessment is required'</i>. SEPA also state that consideration should be given to surface water runoff. Therefore, it is recommended that the existing site requirement is updated to include the following; <i>'Consideration must be given to any surface water runoff'</i>.</p>	<p>It is recommended that the Council agree to allocate this site within the Proposed Local Development Plan and include reference in the introductory text within Volume 2 confirms the need for developers to contact Scottish Water and SEPA at an early stage to identify any potential water/drainage issues to be addressed.</p> <p>It is recommended that the existing site requirement is updated to read as follows; <i>'Flood Risk Assessment is required and</i></p>

			<p>In respect of the foul water comments, the following site requirement is attached; '<i>Early engagement with Scottish Water to ascertain whether a Drainage Impact Assessment is required, in respect of WWTW</i>'. It is noted that SEPA state foul water must connect to the existing Scottish Water foul network. Therefore, it is recommended that reference is made in the introductory text of Volume 2 confirming the need for developers to contact Scottish Water and SEPA at an early stage to identify any potential water/drainage issues to be addressed. It is considered that the above satisfactorily addresses the comments raised by SEPA.</p> <p>Comments are noted in respect of any permissions which may be sought for certain activities from SEPA. However, it should be noted that there is extant planning consent on the site for housing development.</p> <p>It is concluded within the site should be included within the Proposed LDP for housing.</p>	<i>consideration must be given to any surface water runoff</i> .
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	Comments are noted, in support of site (AGREE009). The site was included within the MIR as a preferred option for housing.	It is recommended that the Council agree to allocate this site within the

		<p>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.</p> <p>With completions at their lowest since 2015, there is a serious and pressing need to allocate effective sites.</p> <p>The limited take-up of housing sites demonstrates that there has been a failure to allocate effective sites. 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. <b>(219)</b></p>	<p>It is noted that the site has extant planning consent for housing (16/01360/PPP). Therefore the principle of housing on this site has been established. The site is directly adjacent to the existing settlement boundary therefore the site provides a logical extension to Greenlaw and would integrate well with the existing settlement. There are no insurmountable planning constraints regarding the development of this site. The site is currently brownfield land occupied by former poultry units and the re-use of the site would be a benefit to the wider area.</p> <p>It was concluded that the site should be included within the Proposed LDP for housing.</p>	Proposed Local Development Plan.
Greenlaw	AGREE009, Poultry Farm &	The contributor agrees with the preferred and alternative options for housing in Greenlaw. <b>(215)</b>	<u>AGREE009</u> Comments are noted in respect of	It is recommended that the Council

	<p>AGREE008, Halliburton Road</p>		<p>housing site (AGREE009). It is noted that the site has extant planning consent for housing (16/01360/PPP). Therefore the principle of housing on this site has already been established. The site is directly adjacent to the existing settlement boundary therefore the site provides a logical extension to Greenlaw and would integrate well with the existing settlement. There are no insurmountable planning constraints regarding the development of this site. The site is currently brownfield land occupied by former poultry units and the re-use of the site would be a benefit to the wider area.</p> <p>The site (AGREE009) was included within the MIR as a preferred option for housing development. It was concluded that the site should be included within the Proposed LDP for housing.</p> <p><u>AGREE008</u> Comments are noted in respect of housing site (AGREE008). The site is currently identified within the adopted LDP for potential longer term housing (SGREE003) and was included within the MIR as an alternative option for housing development. There are no insurmountable planning constraints which would prevent the</p>	<p>agree to allocate the site (AGREE009) within the Proposed Local Development Plan.</p> <p>It is recommended that the Council agree not to allocate the site (AGREE008) within the Proposed Local Development Plan, however agree to retain the site as a potential longer term housing option (SGREE003).</p>
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			<p>development of this site. However, there is already a large amount of un-developed established housing land supply within Greenlaw, as well as the site (AGREE009) which has extant planning consent for housing. Therefore, given the existing housing land supply within Greenlaw at present, it is not considered that a further housing site is required. The site will not be included within the Proposed LDP for housing. However, the site will be retained within the Proposed LDP for potential longer term housing.</p>	
Reston	AREST005 Land East of West Reston	<p>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. <b>(199)</b></p>	<p>Comments are noted in respect of planting. The site was included within the MIR as an alternative option for housing. It was concluded that the site should be included within the Proposed LDP for housing.</p> <p>It should be noted that the exact species and location of planting will be assessed and considered as part of any planning application, at that time.</p> <p>However, the following site requirements are attached in respect of landscaping: <i>'Planting on the south eastern boundary to provide enclosure to the site and define a settlement edge', 'Planting</i></p>	<p>It is recommended that the Council agree to allocate the site within the Proposed Local Development Plan.</p>

			<p><i>strip along the north east boundary to retain separation from the existing track and provide, potentially some screening and shelter from the north east', 'Protect existing boundary features, where possible' and 'Planting on the south western boundary to provide separation from the neighbouring properties and buildings'.</i></p>	
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. <b>(119)</b>	<p>Comments from SEPA are noted.</p> <p>The site was included within the MIR as an alternative option for housing. It was concluded that the site should be included within the Proposed LDP for housing.</p> <p>It should be noted that Scottish Water and SEPA were previously consulted at the 'Pre MIR' stage and their advice was taken on board and incorporated within the site requirements. At that stage, Scottish Water advised that Reston WWTW had sufficient capacity and sufficient capacity in the network.</p> <p>SEPA state that the foul water must connect to the existing Scottish Water foul network. Therefore, it is recommended that reference is included in the introductory text within Volume 2 confirming the need for developers to contact Scottish Water and SEPA at an early stage</p>	<p>It is recommended that the Council agree to allocate the site within the Proposed Local Development Plan and introductory text within Volume 2 confirms the need for developers to contact Scottish Water and SEPA at an early stage to identify any potential water/drainage issues to be addressed.</p>



			to identify any potential water/drainage issues to be addressed.	
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. <b>(199)</b>	<p>Comments are noted.</p> <p>The Council's Landscape Officer was consulted on this site and raised no objections to the proposal and stated there are no major constraints.</p> <p>The site will be included within the Proposed LDP for housing. It is considered that the following site requirements address the existing and proposed trees/planting/landscaping within the site: <i>'Protect and enhance the existing boundary features, where possible. This includes the mature beech tree and mature hedge along the western boundary' and 'Appropriate landscaping/planting to be incorporated within the development and the long term maintenance of the landscaped areas must be addressed'.</i></p>	It is recommended that the Council agree to allocate the site within the Proposed Local Development Plan.
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	<p>The site was included within the MIR as a preferred option for housing development.</p> <p>Comments are noted in respect of the FRA and potential surface water hazard. SEPA were previously consulted at the 'Pre MIR' stage and their advice was taken on board and</p>	It is recommended that the Council agree to allocate the site within the Proposed Local Development Plan and introductory text within Volume 2 confirms the need

		<p>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> <p>Foul water must connect to the existing Scottish Water foul network. <b>(119)</b></p>	<p>incorporated within the site requirements. The following site requirement is attached; '<i>Flood Risk Assessment required, to assess the risk from the small watercourse adjacent to the site</i>'.</p> <p>In respect of the foul water comments, SEPA and Scottish Water were previously consulted at the 'Pre MIR' stage and their advice was taken on board and incorporated within the site requirements. The following site requirement is attached in respect of foul drainage: '<i>Early engagement with Scottish Water regarding WWTW and WTW</i>'.</p> <p>It is noted that SEPA state foul water must connect to the existing Scottish Water foul network. Therefore, it is recommended that reference is made in the introductory text within Volume 2 confirming the need for developers to contact Scottish Water and SEPA at an early stage to identify any potential water/drainage issues to be addressed. It is considered that the above satisfactorily addresses the comments raised by SEPA.</p> <p>It is concluded that the site will be included within the Proposed LDP for housing.</p>	<p>for developers to contact Scottish Water and SEPA at an early stage to identify any potential water/drainage issues to be addressed.</p>
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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"> <li>• Known issues with sewage and waste water in Westruther, regularly resulting in sewage rising in street drains;</li> <li>• Outwith the existing LDP development boundary for Westruther;</li> <li>• Disagree with the indicative capacity, 10 houses would not be in keeping with the setting;</li> <li>• Would be imperative that all hedging and trees are retained and their number enhanced to maintain the rural edge of the village;</li> <li>• 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;</li> <li>• 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;</li> <li>• Highlight reasons for refusal of planning application (07/01957/OUT), which they consider to be relevant to this site;</li> <li>• There has been no consultation by Eildon Housing Association with the village; and</li> <li>• The site is incapable of accommodating more than 6 houses.</li> </ul> <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</p>	<p>The site was included within the MIR as a preferred option for housing.</p> <p>Comments are noted in respect of the sewage and waste water. SEPA and Scottish Water were previously consulted at the 'Pre MIR' stage and their advice regarding WWTW and WTW was taken on board. The following site requirement is attached; <i>'Early engagement with Scottish Water regarding the WWTW and WTW'</i>.</p> <p>The comments are noted in respect of the proposal being outwith the LDP development boundary. It should be noted that a large number of sites brought forward within the LDP for housing are located outwith development boundaries. The Proposed LDP includes extending the development boundary around the new allocation.</p> <p>The comments are noted regarding the indicative site capacity. It should be noted that the site capacities are indicative. The final layout would be assessed as part of any planning application, at that time.</p> <p>Comments are noted regarding the retention of the hedging and trees. The Council's Landscape Officer was previously consulted at the 'Pre</p>	<p>It is recommended that the Council agree to allocate the site within the Proposed Local Development Plan.</p>
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		<p>village boundary in order to meet Council, Government and Association targets at the expense of the community and future residents of any houses built. <b>(138)</b></p>	<p>MIR' stage and their advice was taken on board. The following site requirement is attached; <i>'Protect and enhance the existing boundary features, where possible. This includes the mature beech tree and mature hedging along the western boundary'</i>.</p> <p>Comments are noted regarding Westruther being outwith a Rural Growth Area, no public transport, and no housing demand. However, it should be noted that the Proposed LDP aims to ensure that there are a variety of sites for housing throughout the Scottish Borders. Within the adopted LDP there is 1 housing allocation for 5 units within Westruther. There are no insurmountable constraints to the development of housing on this site and it is considered that this site would provide an additional housing opportunity within the settlement. This would ensure that a range of housing opportunities within smaller settlements is being provided for.</p> <p>The comments regarding the previous planning application are noted. However, the current site must be assessed on its own merits, as part of the Proposed Local Development Plan.</p> <p>The comments regarding the lack of</p>	
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			<p>consultation from Eildon Housing Association is noted. However, this is not a planning issue. It should be noted that the site was subject to public consultation through its inclusion within the MIR. Furthermore, the site will be subject to public consultation again through the Proposed LDP.</p> <p>The comments in respect of the housing association are noted. However, it should be noted that each site is assessed on its own merits and is subject to a full site assessment, including internal and external consultation.</p> <p>It was concluded that the site should be included within the Proposed Local Development Plan.</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. <b>(152)</b>	Comments are noted.	No action required.

## 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	Proposed Response to Main Issues Raised	Recommendation
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. <b>(312)</b></p>	<p>Comments noted. The site was included within the Main Issues Report as an option for inclusion within the Proposed LDP. Consequently there were not considered to be any insurmountable reasons nor constraints to prevent it being included. However, in deciding which of the many MIR sites were ultimately included within the proposed LDP consideration was given to a range of factors. These included, for example, the housing land requirement based on the proposed SDP2 which was informed by HNDA2, any developer interest in the site, provision of local facilities / services, comparison with other submitted sites.</p> <p>The existing housing allocation at Crailing Toll (ACRAI001) remains undeveloped and this additional site was submitted by the same landowner with</p>	<p>It is recommended that Crailing Toll, Crailing (ACRAI004) is not included within the Proposed Local Development Plan.</p>

			<p>no evidence of an active developer being associated with the site. Therefore it would be difficult to justify the effectiveness of a larger site when the existing allocation of five units remains undeveloped.</p> <p>It is acknowledged that development at this location may be appropriate in the future however it is not felt that there is a need for a further housing allocation within the village at this point in time.</p> <p>Any future consideration for its inclusion within the LDP would be done in consultation with SEPA.</p>	
Earlston	MEARL004, Georgefield & East Turrford	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. <b>(176)</b>	Comments noted. The site MEARL004 largely relates to two allocated sites AEARL010 & AEARL011 (for housing) and a longer term mixed use site SEARL006.	The Proposed LDP continues to allocate sites: AEARL010 & AEARL011 and identify site SEARL006 as a longer term site.
Eckford	AECKF002, Land at Black Barn	<p>The contributor does not agree with the alternative option for Eckford. <b>(168, 244)</b></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</p>	The site was included within the Main Issues Report as an option for inclusion within the Proposed LDP. Consequently there were not considered to be any insurmountable reasons nor	It is recommended that Land at Black Barn, Eckford (AECKF002) is not included within the Proposed Local Development Plan.

		<p>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. <b>(103)</b></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. <b>(119)</b></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. <b>(168)</b></p> <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</p>	<p>constraints to prevent it being included. However, in deciding which of the many MIR sites were ultimately included within the proposed LDP consideration was given to a range of factors. These included, for example, the housing land requirement based on the proposed SDP2 which was informed by HNDA2, any developer interest in the site, provision of local facilities / services, comparison with other submitted sites.</p> <p>Ultimately it was considered that there were more appropriate sites considered within the MIR to contribute towards the housing land requirement and the site was not included. It is acknowledged that the site could be considered again for inclusion in a future LDP.</p>	
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		<p>development will need to take account of the historic and natural beauty of Eckford and its surroundings. <b>(244)</b></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. <b>(312)</b></p>		
Ednam	AEDNA011, Cliftonhill (v)	<p>The contributor objects to the inclusion of the site within the Main Issues Report. <b>(8, 9, 27, 28, 35, 41, 42, 61, 62, 71, 74, 77, 87, 89, 199, 289)</b></p> <p>The contributor supports the inclusion of the site. <b>(86, 315)</b></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. <b>(8, 27, 28, 35, 42, 62, 71, 74, 77, 87, 89, 289)</b></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. <b>(27)</b></p> <p>The contributor states there is already an existing undeveloped allocation within the village which is for sale. <b>(27, 41, 89)</b></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</p>	<p>This response is in relation to all representation received.</p> <p>In relation to the comments made on road safety, the Roads Planning Team are consulted as part of the Local Development Plan process. They stated <i>'they are able to support this site for residential development on the basis of provision of suitable pedestrian and street lighting connectivity with the rest of the village and the carriageway of the minor public road to the south being widened to 5.5m. Frontage development along the minor public road is highly desirable; however this will require significant engineering works given the difference in level. It should be noted that the shape of the site under consideration does not bode well in terms</i></p>	<p>It is recommended that Cliftonhill (v), Ednam (AEDNA011) is not included within the Proposed Local Development Plan.</p>

		<p>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. <b>(28)</b></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 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. <b>(35)</b></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. <b>(41, 61, 62)</b></p>	<p><i>of a potential layout; however a link through to Eden Park should be considered which would benefit the site. A strip of housing adjacent to the existing public road may be more in-keeping with the form of the village and the lie of the land’.</i></p> <p>In relation to wastewater capacity in Ednam, Scottish Water are consulted as part of the Local Development Plan process. Scottish Water stated that <i>‘Kelso wastewater treatment works has sufficient capacity and there is sufficient capacity in the network’.</i></p> <p>Both SEPA and the Council’s Flood and Coastal Management Team were consulted as part of the site assessment process. SEPA stated that <i>‘a Flood Risk Assessment was required to assess the risk from the small watercourse which flows adjacent to the site and enters the Eden Water. They also stated that consideration will need to be given to bridge and culvert structures within and adjacent to the site. Review of the surface</i></p>	
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		<p>The contributor raises concerns about flooding through the village. <b>(8)</b></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>”. <b>(71)</b></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. <b>(71)</b></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. <b>(74)</b></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. <b>(74, 77)</b></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</p>	<p><i>woodland and hedgerow on boundary. Potential connectivity with the River Tweed SAC via drainage to the Eden water. Mitigation to ensure no significant effect on River Tweed SAC. Mitigation for protected species including bats, badger and breeding birds’.</i> Any development would be requirement to take any necessary ecological assessments and provide mitigation measures where appropriate.</p> <p>On all allocated and windfall sites the Council requires the provision of a proportion of land for affordable and special needs housing, currently set at 25% and will be assessed against Local Development Plan Policy HD1.</p> <p>Should this site be allocated, a planning application would be required to be submitted. As part of this process the site design would need to take into account any listed buildings within or adjacent to the site. There are specific placemaking and design policies and guidance which</p>	
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		<p>there is no brown bin collection available in the area therefore fly tipping and dumping would have an impact on the environment. <b>(74)</b></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. <b>(74)</b></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. <b>(77)</b></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 susceptible to judicial review. <b>(77)</b></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</p>	<p>would need to be taken into consideration.</p> <p>It is acknowledged that Ednam has limited services however it has a bus service to Kelso and Berwick and is only 2.5 miles from Kelso. The village does have a post office, village hall and a primary school.</p> <p>It should be noted there is an existing housing development at West Mill, Ednam with an indicative capacity of 12 units which is currently undeveloped. There is currently a pending planning application on the site for 10 units (17/01563/FUL).</p> <p>The Council are not aware of a new fence being erected on the site. This does not mean the site has been allocated and the landowner does not require consent for this as the field is currently in use for agricultural grazing.</p> <p>It is acknowledged that the site has been subject to previous planning applications which have been refused, although obviously</p>	
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		<p>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</p>	<p>the sites were outwith the villages Development Boundary:</p> <ul style="list-style-type: none"> <li>• 99/00957/OUT - Residential Development</li> <li>• 01/00782/OUT - Residential Development</li> <li>• 04/02140/OUT - Residential Development</li> </ul> <p>These applications were refused on the grounds that the proposals were outwith the Development Boundary.</p> <p>The site has been considered as part of previous LDP reviews. As part of the Examination, the Reporter concluded that once the allocated site (AEDNA002) is fully developed "the preferred area for future period of this Local Plan (2011), if required, will be to the east side of the village". Therefore the site was reconsidered as an alternative option within the Main Issues Report.</p> <p>It is acknowledged that the site is classified as Prime Agricultural Land although it is in the lowest category (3.1). Although the Local Development Plan aims to allocated brownfield land for</p>	
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		<p>holiday cottages used as part of a farm diversification scheme. <b>(86)</b></p> <p>The contributors understand that the site is classed as prime agricultural land and asks how did this status change? 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. <b>(89, 319)</b></p> <p>The contributor raises concerns in relation to wildlife on the site and road safety issues and the need for significant improvements to road safety which would lead to more urbanisation of the rural surroundings. <b>(41, 89)</b></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? <b>(89)</b></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 stated 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. <b>(41, 89)</b></p> <p>The contributor is sceptical that the site can accommodate 15 units. <b>(41)</b></p> <p>The contributor considers Cliftonhill a rural locality rather</p>	<p>redevelopment there is often a need to identified greenfield sites to help meet the housing land requirement and provide a range and choice of housing sites throughout the Scottish Borders.</p> <p>The site capacities contained within the Main Issues Report and the Local Development Plan are only indicative and may vary to the site capacities submitted as part of a planning application on a site.</p> <p>Comments noted regarding the inclusion of woodland identified on the Native Woodland Survey for Scotland which falls within the site boundary.</p> <p>The site was included within the Main Issues Report as an option for inclusion within the Proposed LDP. Consequently there were not considered to be any insurmountable reasons nor constraints to prevent it being included as identified within the adjoining column. However, in deciding which of the many MIR sites were</p>	
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		<p>than a village and would object to street lighting. <b>(62, 89)</b></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.<b>(115)</b></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. <b>(115)</b></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. <b>(115)</b></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 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. <b>(115)</b></p>	<p>ultimately included within the proposed LDP consideration was given to a range of factors. These included, for example, the housing land requirement based on the proposed SDP2 which was informed by HNDA2, any developer interest in the site, provision of local facilities / services, comparison with other submitted sites. Ednam is in very close proximity to Kelso and it is considered relatively large scale housing allocations within the proposed LDP will adequately satisfy the housing land requirement within the LDP period.</p> <p>Ultimately it was considered that there were more appropriate sites considered within the MIR to contribute towards the housing land requirement and the site was not included. It is acknowledged that the site could be considered again for inclusion in a future LDP.</p>	
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		<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. <b>(119)</b></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. (199)</i></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</p>		
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		<p>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. <b>(289)</b></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 good mix of demographics there will be a need for housing that is suitable for starter homes, family homes and general market homes. <b>(315)</b></p>		
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</p>	<p>The land east of Keleden (AEDNA012) has been assessed as part of the site assessment process.</p> <p>A larger site has previously been assessed at the Call for Site Stage of the MIR. The site extended from Keleden down to the Eden Water. One of the reasons the site was not taken forward for formal allocation was due to biodiversity issues identified with regards to the Eden Water.</p>	It is recommended that land east of Keleden, Ednam (AEDNA012) is not included within the Proposed Local Development Plan.

		<p>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. <b>(9)</b></p>	<p>This current proposal relates to a smaller area of land largely set back from the Eden Water presumably in an effort to reduce any potential biodiversity impacts relating to the Eden Water.</p> <p>In this instance it must be noted that the northern part of the site was granted planning consent for a single house by the councils Local Review Body (17/01613/PPP) in February 2019) at their meeting on 16.04.2018 following refusal by Councils planning officers. The main reasons for the LRB allowing this were: <i>'Members noted that the application site was outwith but adjoining the settlement boundary of Ednam as defined in the Local Development Plan. Their ensuing discussion therefore focussed on whether there were strong reasons for an exceptional approval. They attached significant weight to the recent erection of two dwellinghouses on the northern side of the road, which reduced the gap between the settlements of</i></p>	
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			<p><i>Ednam and Cliftonhill, and to the field boundary of the site which they considered represented a more logical boundary to Ednam than the current development boundary</i>. A consequent approval of reserved matters application was approved for a detached house on the site (18/01770/FUL) in February 2019.</p> <p>One of the tests applied for consideration of sites to be included within the LDP is that the site must be able to adequately accommodate five or more houses. This is a test which must be consistently applied to all sites.</p> <p>The site is small in nature and it is not considered it can satisfactorily accommodate the standard test of five or more houses in order to achieve this, this can only be done by creating an over developed site with crammed houses completely out of keeping and character with the existing relatively large detached houses which adjoin the site. This would include the afore said house</p>	
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			approved by the councils LRB	
Ednam	AEDNA013, Land north of Primary School	<p>The contributor objects to the inclusion of the site within the Main Issues Report. <b>(8, 41, 42, 61, 62, 72, 74, 77, 89)</b></p> <p>The contributor considers this site to have better access than AEDNA011. <b>(27)</b></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. <b>(8, 42, 62, 72, 74, 77, 89)</b></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. <b>(35, 61)</b></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. <b>(41, 89)</b></p> <p>The contributor raises concerns that their property would be completely spoilt by the development. <b>(42)</b></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 this could be</p>	<p>Comments and support noted.</p> <p>In relation to the comments made on road safety the Roads Planning Team are consulted as part of the Local Development Plan process. The Roads Planning Team were able to recommend in favour of this land being allocated for development. If the site was developed, the street lighting and footway infrastructure in the village will have to be extended along the main road as appropriate and a modest extension of the 30 mph speed limit is likely to be required. Access should be taken from both the B6461 and the minor public road to the south west to allow a connected street network to develop. A strong street frontage onto the B6461 will create a sense of arrival from the north and will help justify a shifting of the 30 mph speed limit. Depending on the scale of development a Transport Statement may be</p>	<p>It is recommended that land north of the Primary School, Ednam (AEDNA013) is not included within the Proposed Local Development Plan.</p>

	<p>overcome by extending the speed limit zone. <b>(61)</b></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. <b>(62)</b></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. <b>(72)</b></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. <b>(74)</b></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. <b>(62, 74, 77)</b></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. <b>(74)</b></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. <b>(74)</b></p>	<p>required.</p> <p>In relation to wastewater capacity in Ednam, Scottish Water are consulted as part of the Local Development Plan process. Scottish Water stated that '<i>Kelso wastewater treatment works has sufficient capacity and there is sufficient capacity in the network</i>'. </p> <p>Both SEPA and the Council's Flood and Coastal Management Team were consulted as part of the site assessment process. No objections were raised however due to the size of the development it is recommended surface water runoff be considered.</p> <p>As part of the site assessment process the Education Team were consulted and they did not raise any issues with the potential allocation of this site and the capacity of Ednam Primary School.</p> <p>The Ecology Officer is also consulted as part of the site assessment process and in relation to this site stated:</p>	
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		<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. <b>(77)</b></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 susceptible to judicial review. <b>(77)</b></p> <p>The contributor states there is already an existing undeveloped allocation within the village which is for sale. <b>(27, 41, 89)</b></p> <p>The contributor raises concerns about flooding through the village. <b>(8)</b></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. <b>(119)</b></p>	<p><i>'Low impact. Site is an arable field with hedgerow, garden ground and amenity ground on boundary. No obvious connectivity with the River Tweed SAC. Protect boundary features and mitigation for protected species including breeding birds. Any development would be requirement to take any necessary ecological assessments and provide mitigation measures where appropriate.</i></p> <p>Should this site be allocated a planning application would be required to be submitted. As part of this process the site design would need to be in similar character of the existing residential properties within the village. There are specific placemaking and design policies and guidance which would need to be taken into consideration.</p> <p>It is acknowledged that Ednam has limited services however it has a bus service to Kelso and Berwick and is only 2.5 miles from Kelso. The village does have a post office, village hall and a primary school.</p>	
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			<p>It should be noted there is an existing housing development at West Mill, Ednam with an indicative capacity of 12 units which is currently undeveloped. There is currently a pending planning application on the site for 10 units (17/01563/FUL).</p> <p>The site was included within the Main Issues Report as an option for inclusion within the Proposed LDP. Consequently there were not considered to be any insurmountable reasons nor constraints to prevent it being included as identified within the adjoining column. However, in deciding which of the many MIR sites were ultimately included within the proposed LDP consideration was given to a range of factors. These included, for example, the housing land requirement based on the proposed SDP2 which was informed by HNDA2, any developer interest in the site, provision of local facilities / services, comparison with other submitted sites. Ednam is in very close proximity to</p>	
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			<p>Kelso and it is considered relatively large scale housing allocations within the proposed LDP will adequately satisfy the housing land requirement within the LDP period.</p> <p>Ultimately it was considered that there were more appropriate sites considered within the MIR to contribute towards the housing land requirement and the site was not included. It is acknowledged that the site could be considered again for inclusion in a future LDP.</p>	
Jedburgh	AJEDB018, Land east of Howdenburn Court II	<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. Any foul must connect to SW foul sewer network. The contributor also advises that the site has a potential surface water hazard and water environment considerations. <b>(119)</b></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. <b>(213)</b></p>	<p>Comments noted.</p> <p>Following the public consultation period on the Main Issues Report it is considered that this site should be taken forward into the Proposed Plan. The site is within the Jedburgh development boundary and is within the ownership of an active Registered Social Landlord. The site requirements included in the Proposed Plan will include a reference to the need for a pedestrian link between</p>	<p>It is recommended that land east of Howdenburn Court II, Jedburgh (AJEDB018) is included within the Proposed Local Development Plan.</p> <p>Site requirements should include reference to 'potential flood risk to be investigated'.</p> <p>The introductory text in Volume 2</p>

			Lochend (RJ2B), Howdenburn Court and the land east of Howdenburn Court II (AJEDB018).	confirms the need for parties to contact SEPA and Scottish Water at an early stage to identify potential issues to be addressed.
Jedburgh	MJEDB003, Land at Edinburgh Road	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. 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. <b>(321)</b>	<p>Comments noted. The site is allocated within the adopted Local Development Plan 2016 as a business and industrial safeguarded site.</p> <p>It is considered that this site should remain allocated as business and industrial safeguarding with this being carried forward into the Proposed Plan. However it is felt a more flexible approach should be adopted by the Council in respect of whilst ensuring sufficient land is available for business uses there is a need to have a more flexible approach to a low other uses in certain circumstances. It is considered the most effective way to do this is through the revision of Policy ED1 – Protection of Business and Industrial Land. The updated policy could allow a more diverse mix of uses on this site and therefore make it</p>	It is recommended that land at Edinburgh Road (MJEDB003) is not included within the Proposed Local Development Plan. The site should remain part of the existing business and industrial safeguarded site Edinburgh Road (zEL33).

			<p>more attractive for businesses to locate here. Planning applications must satisfy the criteria tests listed within Policy ED1.</p> <p>In conclusion, following the public consultation period on the Main Issues Report it is considered that this site should not be reallocated as a mixed use site into the Proposed Plan.</p>	
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). <b>(63)</b>	<p>Comments noted. The land west of Teapot Bank (AMORE003) has been assessed as part of the site assessment process. The outcome of this assessment was that the site was considered '<i>doubtful</i>'. The site assessment concluded that there are two undeveloped housing allocations within Morebattle, one of which was allocated as part of the Local Plan Amendment in 2011, there is also an approved planning brief covering both of these sites. Therefore it is not considered that there is a requirement for an additional housing site within the settlement at this point in time.</p>	It is recommended that land west of Teapot Bank, Morebattle (AMORE003) is not included within the Proposed Local Development Plan.

			In conclusion, the site will not be taken forward for inclusion within the Proposed Local Development Plan for housing.	
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. 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. <b>(119)</b></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.<b>(124)</b></p>	<p>Comments noted. The land to west of Oxnam Road (AOXNA002) has been assessed as part of the site assessment process. The outcome of this assessment was that the site was considered '<i>unacceptable</i>'.</p> <p>The site assessment concluded that '<i>Oxnam is not a suitable location for the allocation of up to 20 units. An allocation of this scale would be unsustainable and possibly undeliverable. The settlement has been able to grow through development in the countryside policies in recent times. Further organic growth could take place this way or through the inclusion of a development boundary and/or a small allocation for future growth, possibly even on a portion of this site, but 20 units and a site of this size represents significant over-development</i>'.</p> <p>It should be noted Oxnam</p>	Onam settlement profile has been added to Volume 1 of the LDP although it does not include the site AOXNA002.

			<p>settlement profile has been added to Volume 1 of the LDP although it does not include the site in question.</p> <p>In conclusion, the site will not be taken forward for inclusion within the Proposed Local Development Plan.</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. (119)</i></p>	<p>The site was included within the Main Issues Report as an option for inclusion within the Proposed LDP. Consequently there were not considered to be any insurmountable reasons nor constraints to prevent it being included as identified within the adjoining column. However, in deciding which of the many MIR sites were ultimately included within the proposed LDP consideration was given to a range of factors. These included, for example, the housing land requirement based on the proposed SDP2 which was informed by HNDA2, any developer interest in the site, provision of local facilities / services, comparison with other submitted sites.</p> <p>Ultimately it was considered that there were more appropriate sites considered</p>	<p>It is recommended that land at West Third, Smailholm (ASMAI002) is not included within the Proposed Local Development Plan.</p>

			within the MIR to contribute towards the housing land requirement and the site was not included. It is acknowledged that the site could be considered again for inclusion in a future LDP.	
Jedburgh/ Kelso	General	The contributor states we should be encouraging more development in Jedburgh and Kelso to support the schools and small business' <b>(168)</b>	The Local Development Plan identifies a range of housing, redevelopment and business and industrial sites in both Jedburgh and Kelso.	No further action.

## 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	Proposed Response to Main Issues Raised	Recommendation
Eddleston	AEDDL008 Land West of Elibank Park	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	<p>Scottish Planning Policy (SPP) states that a generous supply of housing land for each housing market area within the plan period should be provided to support the achievement of the housing land requirement across all tenures, maintaining at least a 5 year supply of effective housing land at all times. The allocations within the Proposed LDP are to meet the housing land requirement up until 10 years post the adoption of the Plan (2030/31).</p> <p>This site was brought forward through the Development Options Study 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 Main Issues Report (MIR). Paragraph 65 of the Planning Circular 6/2013: Development Planning, states that the Main Issues Report is the key consultation document in terms of front loading effective engagement on the Plan.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA,SNH and NHS) are incorporated into that assessment. In doing this a rigorous site assessment process is used to identify the best sites possible. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, and well as other environmental issues such as archaeology,</p>	It is recommended that the Council agree not to allocate site AEDDL008 Land West of Elibank Park within the Proposed Local Development Plan.

		<p>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. <b>(108 (2 of 2))</b></p> <p>All housing in Eddleston should be removed until you deal with the lack of provisions in the Schools, Doctors etc. <b>(158)</b></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. <b>(46)</b></p> <p>Given the lack of landowner /developer interest of the already-</p>	<p>biodiversity, flood risk and landscape.</p> <p>Whilst the primary responsibility for operating the development planning system for the Scottish Borders lies with the Council, Circular 6/2013 Development Planning states that all interests should be engaged as early and as fully as possible. In addition that document also states “<i>key agencies are under a specific duty to co-operate in the preparation of development plans</i>”; this includes Scottish Natural Heritage, Scottish Environmental Protection Agency, Scottish Water and NHS (Health Board). The Council have consulted with all key agencies throughout the Local Development Plan process and will continue to do so. This then allows key agencies to plan according to their needs and demands also. NHS Borders have stated that they will continue to engage with SBC colleagues to provide primary care and public health input to the wider planning process including the creation of the next Scottish Borders Council Local Development Plan early in its preparation cycle as part of a Health in All Policies approach.</p> <p>With regards to comments relating to landscape, natural heritage, and the River Tweed, it should be noted that Scottish Natural Heritage did not object to the potential inclusion of the site within the Local Development Plan. Furthermore it is also noted that SEPA also, did not object to the potential inclusion of the site within the Plan.</p> <p>SBC flood and coastal management team have not put forward objections and SEPA has raised that consideration should be given to surface runoff.</p> <p>Further discussion has been undertaken with the</p>	
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		<p>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. <b>(112)</b></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.</p>	<p>Education department, and they have confirmed that eth sites contained within the Proposed Local Development Plan can be accommodated in terms of school capacity.</p> <p>Eddleston has few amenities and provision for example a primary school and the Horseshoe Inn. Although Peebles is a short distance away. Eddleston is classed as accessible rural and has a bus service running to Edinburgh in the North and Peebles in the South.</p> <p>It should also be noted that whilst the site is currently in agricultural use for grazing however, the land is not identified as Prime Quality Agricultural Land. The identification of some greenfield / agricultural land is inevitable.</p> <p>It is noted that pedestrian access would be needed to connect the site with the rest of Eddleston. It's stated in the site requirements that a pedestrian link to the village is required. Road's planning have also stated that the road leading out of Eddleston to the site would need widening and a pedestrian link with the village and lighting would be needed.</p> <p>The Council in its official capacity have the authority to allocate sites where appropriate and amend the development boundary through the Local Development Plan process.</p> <p>Significantly, during the MIR public consultation process the land owner did not wish this site to be included within the LDP, suggesting a preference for their site AEDD010. Consequently whilst it is not considered there are any insurmountable issues to prevent the site being allocated, the land owner's</p>	
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		<p>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. <b>(119)</b></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. <b>(199)</b></p> <p>Development of the community of Eddleston which is easily</p>	<p>reluctance to allow its release prevents its inclusion within the LDP.</p>	
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		<p>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. <b>(206)</b></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 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. <b>(213)</b></p> <p>We do not believe AEDDL008 meets the criteria set out in Sections 5.10 and 5.14 that any</p>		
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		<p>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.</p> <p>The contributor has concerns about water run-off from</p>		
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		<p>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. <b>(237)</b></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. <b>(255)</b></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</p>		
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		identified 'alternative' sites in the village to contribute to housing during the Plan period. The potential flood risk issues are also noted. <b>(317)</b>		
Eddleston	AEDDL009 Land South of Cemetery	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	<p>It should be noted that the housing site (AEDDL009) in Eddleston was included within the Main Issues Report. However, throughout the course of the MIR consultation process it became evident that the northern part of the site was in a separate ownership. Therefore, the site was reduced in size, the site capacity reduced to 30 and a new site code plotted as (AEDDL010). The site (AEDDL010) is proposed for inclusion within the Proposed LDP.</p> <p>This site was brought forward through the Development Options Study 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 Main Issues Report (MIR). Paragraph 65 of the Planning Circular 6/2013: Development Planning, states that the Main Issues Report is the key consultation document in terms of front loading effective engagement on the Plan.</p> <p>Scottish Planning Policy (SPP) states that a generous supply of housing land for each housing market area within the plan period should be provided to support the achievement of the housing land requirement across all tenures, maintaining at least a 5 year supply of effective housing land at all times. The allocations within the Proposed LDP are to meet the housing land requirement up until 10 years post the adoption of the Plan (2030/31).</p> <p>In the consideration of any site for inclusion in the</p>	It is recommended that the Council agree not to allocate site AEDDL009 Land South of Cemetery within the Proposed Local Development Plan. However, it is recommended that the Council agree to allocate site AEDDL010 Land South of Cemetery within the Proposed Local Development Plan.

		<p>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. <b>(108 (2 of 2))</b></p> <p>All housing in Eddleston should be removed until you deal with the lack of provisions in the Schools, Doctors etc. <b>(158)</b></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. <b>(46)</b></p> <p>Given the lack of landowner /developer interest of the already-</p>	<p>LDP, a full site assessment is carried out and the views various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA,SNH and NHS) are incorporated into that assessment. In doing this a rigorous site assessment process is used to identify the best sites possible. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, and well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>Whilst the primary responsibility for operating the development planning system for the Scottish Borders lies with the Council, Circular 6/2013 Development Planning states that all interests should be engaged as early and as fully as possible. In addition that document also states “<i>key agencies are under a specific duty to co-operate in the preparation of development plans</i>”; this includes Scottish Natural Heritage, Scottish Environmental Protection Agency, Scottish Water and NHS (Health Board). The Council have consulted with all key agencies throughout the Local Development Plan process and will continue to do so. This then allows key agencies to plan according to their needs and demands also. NHS Borders have stated that they will continue to engage with SBC colleagues to provide primary care and public health input to the wider planning process including the creation of the next Scottish Borders Council Local Development Plan early in its preparation cycle as part of a Health in All Policies approach.</p> <p>The site is greenfield. It should also be noted that whilst the site is currently in agricultural use for grazing, however the land is not identified as Prime</p>	
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		<p>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. <b>(112)</b></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</p>	<p>Quality Agricultural Land. The identification of some greenfield / agricultural land is inevitable.</p> <p>With regards to comments relating to landscape, natural heritage, and the River Tweed, it should be noted that Scottish Natural Heritage did not object to the potential inclusion of the site within the Local Development Plan but recommended a planning brief should be prepared. Furthermore it is also noted that SEPA also, did not object to the potential inclusion of the site within the Plan.</p> <p>SEPA has requested that a FRA would be required. SEPA have stated that consideration should be given to surface runoff. SBC Flood and Coastal Management team identify that the south part of the site is at risk of a 1 in 200 year flood and would therefore require an FRA, and if properties were out with this area there would be scope for approval. A site requirement for a FRA has been carried forward from the Main Issues Report and into the Proposed plan.</p> <p>Further discussion has been undertaken with the Education department, and they have confirmed that the sites contained within the Proposed Local Development Plan can be accommodated in terms of school capacity.</p> <p>It is noted that pedestrian access would be needed to connect the site with the rest of Eddleston. It's stated in the site requirements that a pedestrian link to the village is required and also the potential to connect with the old railway line and/or Elibank Park. Road's planning have also stated that the road leading out of Eddleston to the site would need widening and a pedestrian link with the village and</p>	
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		<p>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 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. <b>(119)</b></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</p>	<p>lighting would be needed. It's the understanding the land south side of the road out of Eddleston to the site is owned by the Council (Elibank Park) therefore it would be possible to create a pedestrian link from the site into the village.</p> <p>The Council in its official capacity have the authority to allocate sites where appropriate and amend the development boundary through the Local Development Plan process.</p> <p>Eddleston has few amenities and provision, for example a primary school and the Horseshoe Inn. Although Peebles is a short distance away. Eddleston is classed as accessible rural and has a bus service running to Edinburgh in the North and Peebles in the South.</p> <p>In light of the consultation responses received and further investigation on the site AEDDL009 Land South of Cemetery, it is recommended that a site with an amended site boundary at this location, site AEDDL010 is taken forward into the Proposed Local Development Plan.</p>	
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		<p>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. <b>(206)</b></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. <b>(213)</b></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</p>		
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		<p>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. <b>(237)</b></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. <b>(255)</b></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</p>		
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		during the Plan period. The potential flood risk issues are also noted. <b>(317)</b>		
Eddleston	SEDDL001 North of Bellfield II	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.	<p>Scottish Planning Policy (SPP) states that a generous supply of housing land for each housing market area within the plan period should be provided to support the achievement of the housing land requirement across all tenures, maintaining at least a 5 year supply of effective housing land at all times. The allocations within the Proposed LDP are to meet the housing land requirement up until 10 years post the adoption of the Plan (2030/31).</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA,SNH and NHS) are incorporated into that assessment. In doing this a rigorous site assessment process is used to identify the best sites possible. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, and well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>Whilst the primary responsibility for operating the development planning system for the Scottish Borders lies with the Council, Circular 6/2013 Development Planning states that all interests should be engaged as early and as fully as possible. In addition that document also states “<i>key agencies are under a specific duty to co-operate in the preparation of development plans</i>”; this includes Scottish Natural Heritage, Scottish Environmental Protection Agency, Scottish Water and NHS (Health Board). The Council have consulted with all key</p>	<p>It is recommended that the Council agree not to allocate site SEDDL001 North of Bellfield II within the Proposed Local Development Plan.</p> <p>It is recommended that the SEA scoring for Cultural Heritage for site SEDDL001 is amended from neutral to significantly negative. In addition it is recommended to update the additional notes, SEA comments and Mitigation to reflect the proposed change.</p>

		<p>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. <b>(108 (2 of 2))</b></p> <p>All housing in Eddleston should be removed until you deal with the lack of provisions in the Schools, Doctors etc. <b>(158)</b></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. <b>(46)</b></p> <p>We require an FRA which assesses the risk from the Eddleston Water. Due to the gradients on site, the majority of</p>	<p>agencies throughout the Local Development Plan process and will continue to do so. This then allows key agencies to plan according to their needs and demands also. NHS Borders have stated that they will continue to engage with SBC colleagues to provide primary care and public health input to the wider planning process including the creation of the next Scottish Borders Council Local Development Plan early in its preparation cycle as part of a Health in All Policies approach.</p> <p>With regards to comments relating to landscape, natural heritage, and the River Tweed, it should be noted that Scottish Natural Heritage did not object to the potential inclusion of the site within the Local Development Plan. Furthermore it is also noted that SEPA did not object to the potential inclusion of the site within the Plan.</p> <p>It should also be noted that whilst the site is currently in agricultural use for grazing however, the land is not identified as Prime Quality Agricultural Land. The identification of some greenfield / agricultural land is inevitable.</p> <p>SBC flood and coastal management team have not put forward objections. SEPA has raised that consideration should be given to surface runoff, potential surface water hazard, potential surface water flood risk. A FRA would be required, and it is noted that consideration should be given to the increase in probability of flooding elsewhere if the site was to be developed.</p> <p>Further discussion has been undertaken with the Education department, and they have confirmed that eth sites contained within the Proposed Local</p>	
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		<p>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</p>	<p>Development Plan can be accommodated in terms of school capacity.</p> <p>Eddleston has few amenities and provision for example a primary school and the Horseshoe Inn. Although Peebles is a short distance away. Eddleston is classed as accessible rural and has a bus service running to Edinburgh in the North and Peebles in the South.</p> <p>Whilst it is not considered there are any insurmountable reasons for the site not being allocated developers could only take place once the allocated site to the south (AEDDL002) is completed. It is likely some time before this occurs and no planning applications have been submitted as yet for its development. Consequently it is premature to allocate this site.</p>	
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		<p>risk of pollution during construction to the water environment is minimised. <b>(119)</b></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 use. <b>(213)</b></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. <b>(237)</b></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. <b>(255)</b></p>		
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		<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.</p> <p><b>(164)</b></p>	<p>Comments accepted.</p> <p>It is recommended that the scoring for Cultural Heritage of the SEA as it relates to site SEDDL001 will be amended from neutral to negative. In addition it is proposed to update the additional notes, SEA comments and Mitigation to reflect this change.</p> <p>(It is noted that these comments have also been recorded under the Strategic Environmental Assessment).</p>	
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.</p> <p><b>(185)</b></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</p>	<p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development.</p> <p>The MIR in paragraph 3.3 notes that "<i>it is not anticipated the LDP [Local Development Plan] 2 will require a significant number of new housing sites</i>". The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses. In addition, it should be noted that the Council are also required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas.</p> <p>Scottish Planning Policy (SPP) states that a generous supply of housing land for each housing market area within the plan period should be provided to support the achievement of the housing</p>	<p>It is recommended that the Council agree to allocate site AEDDL010 Land South of Cemetery within the Proposed Local Development Plan.</p>



		<p>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. <b>(237)</b></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. <b>(255)</b></p> <p>I question why the land on the opposite side of the main road from</p>	<p>land requirement across all tenures, maintaining at least a 5 year supply of effective housing land at all times. The allocations within the Proposed LDP are to meet the housing land requirement up until 10 years post the adoption of the Plan (2030/31).</p> <p>The Council has identified that further housing allocations are required in the Western Rural Growth Area. A study was carried out, the purpose of the Development Options Study was to identify and assess options for housing and employment land in the Western Rural Growth Area/Strategic Development Area, centred on Tweeddale. Sites were identified within Eddleston which could help meet housing requirements.</p> <p>In light of the consultation responses received and further investigation, it is recommended that a site with an amended site boundary - site AEDDL010 is taken forward into the Proposed Local Development Plan.</p>	
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		AEDDL001 has not been considered. <b>(283)</b>		
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## 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	Proposed Response to Main Issues Raised	Recommendation
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. <b>(323)</b>	Support and comments noted.	No action required.
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	It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that " <i>it is not anticipated the [Local Development Plan] LDP2 will require a significant number of new housing sites</i> ". The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.  The longer term sites identified within the current LDP that are located on the south of the River – SPEEB003, SPEEB004 and SPEEB005 are all subject to a site	No further action required.

		<p>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)</p>	<p>requirement for the provision of a new bridge. The Council accepts that for these sites and for any other potential new sites south of the River Tweed at Peebles, these too will be dependent on a new bridge. The Council has included the requirement for a new bridge within its Capital Plan and have allocated funding towards taking that project forward from 2028 to 2029. However, it should be noted that further public consultation on that project is required.</p> <p>Despite the matter of the requirement for a new bridge, it should be noted that the Council are required to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>In respect to comments regarding the potential for possibilities for satellite agri-forestry research/businesses in Eshiels/ Cardrona, it should be noted that this would be a matter that would be</p>	
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			dealt with at planning application stage if demand for such uses materialised.	
Northern Housing Market Area	Western Borders Rural Growth Area	<p>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 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. 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</p>	<p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that "<i>it is not anticipated the [Local Development Plan] LDP2 will require a significant number of new housing sites</i>". The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>In addition, it should be noted that the Council are also required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas. Scottish Planning Policy requires LDP's to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p>	No further action required.

		<p>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 Kittlegairy 2 development and there is a long history of developers paying lip service to sustainable drainage systems as they try to pack as many houses as possible onto the land. <b>(30, 46)</b></p>	<p>It should be noted allocations must be considered where there is a market interest which is why options in and around Peebles were considered.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>It should also be noted, that it is now not intended to allocate within the Proposed Local Development Plan the mixed use sites at Eshiels, ((sites - MESH1001 and MESH1002 (Land at Eshiels I and II)) which both had included a residential element.</p>	
Northern Housing Market Area	Western Borders Rural Growth Area	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,	<p>See response above relating to Western Rural Growth Area.</p> <p>In addition, in respect to the Peebles Bridge issue, the most recent traffic count on behalf of the Council for</p>	No further action required.

		<p>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> <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</p>	<p>Tweed Bridge was undertaken in November 2018. It is the Council's opinion that Tweed Bridge does not have the capacity to serve any development other than small infill proposals, but that this would be at the cost of increased congestion on the north side of the River at peak commuter times, and that these developments would take the existing bridge close to capacity. At this point in time there is no definitive date as to when the new bridge may be constructed and a feasibility study must be prepared in advance.</p> <p>It is noted that the Council is progressing on the review of the school estate. In respect to that review, the Council at their meeting of 29 November 2018 agreed the indicative sequence and priority for investment as follows: Galashiels, Hawick, Selkirk and Peebles. That report noted that the property maintenance issues are not as significant for Selkirk or Peebles, however, both will still require expenditure; and due to potential role and capacity pressures particularly at Peebles the priority of strategic plans beyond Galashiels will continue to be re-assessed in a proactive manner. However, following the major fire at Peebles High School in November 2019, the</p>	
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		<p>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</p>	<p>Council has had to revise its capital plans, to not only replace what was lost, but maximise the opportunities to enhance facilities on the site. This has been undertaken in parallel with the planned significant concurrent investment to deliver new Community Campuses in Galashiels and Hawick.</p> <p>It should also be noted that additional discussion has been carried out with the Education Officer who has stated that there is sufficient school capacity available to accommodate the new proposals contained within Proposed LDP.</p> <p>Whilst the primary responsibility for operating the development planning system for the Scottish Borders lies with the Council, Circular 6/2013 Development Planning states that all interests should be engaged as early and as fully as possible. In addition that document also states "<i>key agencies are under a specific duty to co-operate in the preparation of development plans</i>"; this includes Scottish Natural Heritage, Scottish Environmental Protection Agency, Scottish Water and NHS (Health Board). The Council have consulted with all key agencies throughout the Local Development Plan process and will continue to do so. This then allows key agencies to plan</p>	
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		<p>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> <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</p>	<p>according to their needs and demands also. NHS Borders have stated that they will continue to engage with SBC colleagues to provide primary care and public health input to the wider planning process including the creation of the next Scottish Borders Council Local Development Plan (LDP) early in its preparation cycle as part of a Health in All Policies approach.</p> <p>It should be noted that economic development is an important element that will be taken forward into LDP2. As a result, the MIR identified a series of potential mixed use sites within the Western Rural Growth Area with the intention of attracting inward investment in the area and to assist in meeting demand for business and industrial land.</p> <p>LDP policy HD1 Affordable and Special Needs Housing seeks to ensure that new housing development provides an appropriate range and choice of affordable units as well as mainstream market housing. In addition, the policy seeks a 25% developer contribution to affordable housing.</p> <p>It should also be noted that LDP policy ED7 Business, Tourism and</p>	
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		<p>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</p>	<p>Leisure Development in the Countryside aims to allow for appropriate employment generating development in the countryside whilst protecting the environment and to ensure that business, tourism and leisure related developments are appropriate to their location. It is not considered that any of the potential sites identified within the MIR is contrary to this policy.</p> <p>In respect to comments regarding flood risk, it should be noted that SEPA provide comments on all sites considered through the LDP process, and they also provide comment and advice to promote safe and resilient communities and businesses through sustainable flood risk management. In addition, SEPA contribute to the Development Management process through responding to planning application consultations and as part of that process ensuring that adequate attention has been paid to flood risk and climate change.</p> <p>It is not considered that the MIR presents an over reliance on large sites or a lack of knowledge of landowner support. It should be noted that the LDP must identify sufficient land for development to meet the five year housing land requirement, that requirement is</p>	
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		<p>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 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?</p>	<p>available throughout the lifetime of the Plan. That requires the Plan to identify sufficient land for 10 years from the date of adoption. It is therefore not necessary for all the land identified to be effective or partially effective.</p> <p>In respect to the use of brownfield/greenfield land, often brownfield sites have constraints that prevent their early development from taking place. Paragraph 119 of the Scottish Planning Policy (SPP) states “... <i>In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met</i>”.</p> <p>Whilst it is noted that previously developed brownfield land in built-up areas must continue to play a vital role for a range of purposes including housing; it is important that all developments, be they on brownfield or greenfield, are in the right place, in the right scale, with the right infrastructure.</p>	
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		<p>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</p>		
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		<p>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 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</p>		
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		<p>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. 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</p>		
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		<p>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 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)</p>		
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		development should be permitted. <b>(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)</b>		
Northern Housing Market Area	Western Borders Rural Growth Area – Alternatives to significant areas of development	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. <b>(197)</b>	Comments noted. In allocating sites to satisfy the housing land requirement and provide a range and choice of opportunities it is contended that the Main Issues Report (MIR) does give sufficient consideration to opportunities to small scale improvements to small towns. In respect to the potential for a new settlement, Scottish Planning Policy states that “ <i>The creation of a new settlement may occasionally be a necessary part of a spatial strategy, where it is justified either by the scale and nature of the housing land requirement and the existence of major constraints to the further growth of existing settlements, or by its essential role in promoting regeneration or rural development.</i> ” At this time it is not necessary to plan a new settlement. Whilst the creation of a new settlement may appear to be a viable alternative, considerable upfront investment and planning is required to take a project of that scale forward. In that respect it is noted that Scottish Planning Policy requires Local Development Plans (LDP) to allocate a range of sites which are effective or expected to become effective in the plan period	No further action required.



			<p>to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system. In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified.</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>The purpose of the Development Options Study was to identify and assess options for housing and employment land in the Western Rural Growth Area/Strategic Development Area. Whilst the western area has a considerable amount of undeveloped allocated housing land, it should be noted that much of this is within Innerleithen and Walkerburn which have more limited housing market interest. Historically Peebles has a vibrant market for housing development and the development industry will continue to seek further land in this area to meet demand. However, due</p>	No further action required.

		<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> <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</p>	<p>to a number of physical and infrastructure constraints further housing site options are limited. Consequently consultants were appointed to prepare a study to identify both potential short (within the time frame of the Local Development Plan (LDP)) and long term (beyond the LDP time frame) housing options as well as to identify sites for business/industrial use and their findings have influenced the options being suggested.</p> <p>In relation to the Development Options Study, it is noted that that document 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 Main Issues Report (MIR). Paragraph 65 of the Planning Circular 6/2013: Development Planning, states that the MIR is the key consultation document in terms of front loading effective engagement on the Plan.</p> <p>It should be noted that it is not intended that all of the sites identified within the MIR for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that “<i>it is not anticipated the LDP2 will require a significant number of new housing</i></p>	
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	<p>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</p>	<p><i>sites</i>”. The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>In addition, it should be noted that the Council are also required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas. Scottish Planning Policy requires LDP’s to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system. In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified.</p> <p>The complete Western Rural Growth</p>	
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		<p>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 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</p>	<p>Area study has been available online since the publication of the MIR at the following link:  <a href="https://www.scotborders.gov.uk/downloads/download/1016/western_rural_growth_areas_development_options_study">https://www.scotborders.gov.uk/downloads/download/1016/western_rural_growth_areas_development_options_study</a></p> <p>In addition site assessments have been undertaken for the sites considered identified within the MIR and these can be accessed at the following link:  <a href="https://www.scotborders.gov.uk/downloads/file/5236/site_assessment_preferred_and_alternative_sites">https://www.scotborders.gov.uk/downloads/file/5236/site_assessment_preferred_and_alternative_sites</a></p> <p>Furthermore the site assessments for those sites excluded from the MIR can be accessed at the following link:  <a href="https://www.scotborders.gov.uk/downloads/file/5237/site_assessment_excluded_sites">https://www.scotborders.gov.uk/downloads/file/5237/site_assessment_excluded_sites</a></p> <p>It is acknowledged that the MIR has identified potential longer term sites south of the River Tweed. However, the constraint of the Bridge has been identified and it is noted that these sites were potential longer term options and not sites being considered for development in the short term.</p>	
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		<p>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.</p> <p><b>(30, 73, 80, 90, 111, 114, 139, 155, 277)</b></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.</p> <p><b>(127 (1 of 3))</b></p>	<p>The purpose of the Development Options Study was to identify and assess options for housing and employment land in the Western Rural Growth Area/ Strategic Development Area. Whilst the western area has a considerable amount of undeveloped allocated housing land, it should be noted that much of this is within Innerleithen and Walkerburn which have more limited housing market interest. Historically Peebles has a vibrant market for housing development and the development industry will continue to seek further land in this area to meet demand. However, due to a number of physical and infrastructure constraints further housing site options are limited.</p> <p>It should also be noted, that the Council have not received any acceptable alternative locations for Housing/ Mixed Use/ Business and Industrial sites within the Western Strategic Development Area for inclusion in the Local Development</p>	No further action required.

			<p>Plan 2 as part of the call for sites or public consultation process.</p> <p>Consequently consultants were appointed to prepare a study to identify both potential short and long term housing options as well as to identify sites for business/industrial use and their findings have influenced the options being suggested.</p>	
Blyth Bridge	<p>ABLYT004 Blyth Bridge South, &amp; SBBLY002 Blyth Bridge Development Boundary Amendment</p>	<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. <b>(264)</b></p>	<p>The site was submitted in response to the Main Issues Report public consultation.</p> <p>Following full site assessment, it is considered that the site would not integrate well into the settlement and appears separate from the rest of the settlement. The settlement has limited access to services and facilities. In addition, the site is located within the SBC Scotstoun Designed Landscape. Roads Planning have stated that they are not in favour of the allocation of the site.</p> <p>It is noted that it is important that all developments, be they identified on large or small sites, are in the right place, in the right scale, with the right infrastructure.</p> <p>As a result of the above, it is not considered appropriate to allocate site ABLYT004 Blyth Bridge South,</p>	<p>It is recommended that the Council agree to not allocate this site and the potential Development Boundary Amendment within the Proposed LDP.</p>

			or include the Blyth Bridge Development Boundary Amendment - SBBLY002 within the Proposed Plan.	
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</p>	<p>The site was submitted as part of the Main Issues Report public consultation.</p> <p>It should be noted that the '<i>Western Rural Growth Area: Development Options Study</i>' that was undertaken to assist in identifying sites within the Western Strategic Development Area. Whilst Blyth Bridge is located within the Northern Housing Market Area, it is not located within the Western Strategic Development Area.</p> <p>Following a full site assessment it is considered that site ABLY005 is not appropriate for allocation. The site is located within a settlement that experiences a lack of services and facilities. Whilst the site fits well within the settlement there is a potential co-location issue - the site is adjacent to a large (and expanding dairy) farm. There are little in the way of natural boundary features, although there is a dry stone boundary wall along north east. Roads Planning state that they are not opposed to a limited amount of development so long as junction visibility at the A701 is improved and the existing road infrastructure is</p>	<p>It is recommended that the Council agrees that the site should not be proposed for inclusion in the Proposed LDP.</p>

		account of demand and lack of major infrastructure constraints. <b>(317)</b>	<p>extended into the site.</p> <p>In addition it is considered that there are other more appropriate sites available outwith the Strategic Development Area and within the Northern Housing Market.</p> <p>As a result of the above, it is not considered appropriate to allocate site ABLYT005 East of Blyth Farm within the Proposed Plan. However, development of the site could be tested under the Council's Housing in the Countryside Policy.</p>	
Cardrona	Housing	The contributor states that they would support further housing at Cardrona. <b>(273)</b>	Support noted.	No action required.
Cardrona	ACARD002 West of B7062	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	<p>It is noted that this is a new site submitted as part of the Main Issues Report (MIR) public consultation. A site at this location was previously rejected by the Local Plan Inquiry Reporter, it is noted that the Inquiry Reporter commented on that particular site that "<i>The new building frontage would be obvious to those passing through on this road [B7062], as it would form what would be essentially ribbon development ... far from improving the character of the road, I consider that this would be very unwelcome and out of character on what is essentially a very scenic rural road, not a housing access.</i>"</p> <p>It is noted that the potential longer</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.



		<p>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 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. <b>(308)</b></p>	<p>term mixed use site identified within the MIR and raised by the contributor in their submission, provides the opportunity for a mix of uses including land for business. In addition, it is noted that the MIR set out a site requirement for a masterplan to be prepared for the site. It is noted that all potential longer term sites are subject to further assessment and review.</p> <p>It is also noted that at this time, Cardrona already benefits from an undeveloped mixed use allocation, site MCARD006 for 25 units.</p> <p>It is therefore considered that there are other more appropriate sites to take forward into the Local Development Plan (LDP) within the Western Strategic Development Area in the short term, and it is therefore not recommended to take site ACARD002 into the Proposed LDP.</p>	
Cardrona	ACARD003 West of Cardrona,	<p>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</p>	<p>It is noted that this is a new site submitted as part of the Main Issue Report public consultation.</p> <p>A site at this location was previously rejected by the Local Plan Inquiry Reporter, it is noted that the Inquiry Reporter commented on that particular site that "<i>The new building frontage would be obvious to those passing through on this road</i></p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>

		<p>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. <b>(117)</b></p>	<p>[B7062], <i>as it would form what would be essentially ribbon development ... far from improving the character of the road, I consider that this would be very unwelcome and out of character on what is essentially a very scenic rural road, not a housing access.</i>"</p> <p>It is also noted that at this time, Cardrona already benefits from an undeveloped mixed use allocation, site MCARD006 for 25 units.</p> <p>It is therefore considered that there are other more appropriate sites to take forward into the Local Development Plan (LDP) within the Western Strategic Development Area in the short term, and it is therefore not recommended to take site ACARD002 into the Proposed LDP.</p>	
Dolphinton	ADOLP004 Land to the North of Dolphinton	<p>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. <b>(1 (2 and 3 of 3))</b></p>	<p>Comments and support noted.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, and as a result of further consideration on the matter, it is proposed that this site ADOLP004 will not be taken forward into the Proposed Local Development Plan (LDP) as a housing site.</p> <p>It is noted that as a small settlement with an existing housing allocation</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>

			<p>for 5 units that has not yet seen development, it is not appropriate at this time to allocate an additional site. It is therefore recommended that this site is not allocated within the Proposed Local Development Plan. Nevertheless, it is acknowledged that the site could be considered again for inclusion in a future LDP.</p> <p>As a result of the above, it is considered inappropriate to identify site ADOLP004 within the Proposed LDP.</p>	
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</p>	<p>Scottish Planning Policy requires Local Development Plans (LDP) to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system. In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. This rigorous site</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>

		<p>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. 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</p>	<p>assessment process allows for the identification of the best sites possible.</p> <p>It should be noted that the proposal raised by the contributor was located outwith the Dolphinton Development Boundary and would have been considered against Development in the Countryside policies whilst this proposal for a new site is being considered in the context of the Local Development Plan and planning for the settlement.</p> <p>It should be noted that the issue regarding loss of a view is not a material consideration in Planning. In respect to comments regarding amenity, it should be noted that Policy HD3 Protection of Residential Amenity would be relevant in the consideration of any planning application on the site.</p> <p>It should be noted that site ADOLP003 is an allocated Housing site within the Adopted Local Development Plan 2016 and was not subject to the Main Issues</p>	
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		<p>assessment, landscaping, privacy, affordable housing, overhead cables, and alterations to the current road structure.  <b>(14, 15, 26, 44)</b></p>	<p>Report consultation.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, and as a result of further consideration on the matter, it is proposed that this site ADOLP004 will not be taken forward into the Proposed LDP as a housing site.</p> <p>As a result of the above, it is considered inappropriate to identify site ADOLP004 within the Proposed LDP.</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. 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>Comments noted.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, and as a result of further consideration on the matter, it is proposed that this site ADOLP004 will not be taken forward into the Proposed Local Development Plan (LDP) as a housing site.</p> <p>As a result of the above, it is considered inappropriate to identify site ADOLP004 within the Proposed LDP.</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</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. <b>(119)</b></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"> <li>• Retention of woodland along the A702 boundary of the site;</li> <li>• Maintain and enhance pedestrian and cycle access established by LDP1 allocation DOLP003. <b>(213)</b></li> </ul>	<p>Comments noted.</p> <p>However, in light of the consultation responses received during the Main Issues Report public consultation, and as a result of further consideration on the matter, it is proposed that this site ADOLP004 will not be taken forward into the Proposed Local Development Plan (LDP) as a housing site.</p> <p>As a result of the above, it is considered inappropriate to identify site ADOLP004 within the Proposed LDP.</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.
Dolphinton	ADOLP004 Land to the North of	<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</p>	<p>Comments noted.</p> <p>However, in light of the consultation</p>	It is recommended that the Council agree not to

	Dolphinton, Dolphinton	protected and enhanced through additional planting. However, they stress that the additional planting should be native and UK sourced and grown. <b>(199)</b>	<p>responses received during the Main Issues Report public consultation, and as a result of further consideration on the matter, it is proposed that this site ADOLP004 will not be taken forward into the Proposed Local Development Plan (LDP) as a housing site.</p> <p>As a result of the above, it is considered inappropriate to identify site ADOLP004 within the Proposed LDP.</p>	allocate this site within the Proposed Local Development Plan.
Eshiels	AESHI001, Land at Eshiels III	The contributor has submitted a site (AESHI001) for consideration as a potential housing allocation. <b>(267)</b>	<p>It is noted that this is a new site submitted as part of the MIR public consultation.</p> <p>It is not intended to allocate this site within the Proposed LDP, as Roads Planning have stated that the existing access road leading to the site is unable to support the level of development proposed and upgrading of the road is difficult due to its constrained nature. The only feasible way to access this site would be via Site MESH1002 and it is not intended to allocate that site within the Plan.</p> <p>In addition it is noted that Scottish Natural Heritage are of the opinion that development at this location has potential to have an adverse impact on the character of the area.</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.
Heriot Station	Heriot	The contributor states that small-scale organic developments in the future that will ensure that	It is appreciated that the Heriot community extends beyond that of	No further action required.

		<p>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. <b>(105)</b></p>	<p>Heriot Station – the recognised settlement within the Local Development Plan. Whilst it is noted that the Plan does not propose any new development sites within the settlement of Heriot; it is also noted that recent planning approvals and associated development have taken place under the Development in the Countryside Policies. These policies support appropriate development in the countryside on appropriate sites.</p>	
Heriot Station	AHERI003 Heriot East	<p>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. <b>(294 (2 &amp; 3 of 3))</b></p>	<p>The site was submitted as part of the Main Issues Report public consultation.</p> <p>Following a full site assessment it is considered that site AHERI003 is not appropriate for allocation. The site has limited access to public transport, services and employment. Due to its location, the site is separate from the rest of the settlement, and physically separated by the railway and the Gala Water. The site abuts the railway line and the A7, meaning noise and vibration levels may be higher than can be accepted by Environmental Health. In addition, Roads Planning do not support the allocation of the site.</p> <p>Taking into consideration the above points, the site will not be included in the Proposed Local Development Plan (LDP).</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>



			<p>In addition it is considered that there are other more appropriate sites available outwith the Strategic Development Areas and within the Northern Housing Market.</p> <p>As a result of the above, it is considered inappropriate to identify site AHERI003 within the Proposed LDP.</p>	
Lamancha	ALAMA001 Grange Courtyard	The contributor seeks the allocation of site ALAMA001 for housing. <b>(75)</b>	<p>The site was submitted as part of the Main Issues Report public consultation.</p> <p>Following a full site assessment it is considered that site ALAMA001 is not appropriate for allocation. Lamancha is not recognised as a settlement within the Local Development Plan (LDP), and has limited access to public transport and services, as well as limited access to employment. SEPA state that consideration should be 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. However, the site does appear to integrate well with the rest of the established development. The contaminated land officer has indicated that there is potential for contamination on part of site. The Roads Planning section have also stated that the development would require the</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p> <p>It is also recommended that the Council can consider this proposal through the Development Management Process.</p>

			<p>upgrading of private access road. The site would also rely on private WWTW.</p> <p>It is noted that the Council have a supportive policy for development outwith settlements in terms of Policy HD2 'Housing in the Countryside'. Therefore, it is considered that this proposal can be considered against that policy as well as other appropriate policies through the Development Management process should a planning application be submitted. Policy HD2 aims to encourage housing development in appropriate locations in the countryside.</p> <p>As a result of the above, it is considered inappropriate to allocate site ALAMA001 Grange Courtyard within the Proposed LDP.</p>	
Lauder	ALAUD008 Maitland Park Phase 2	<p>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</p>	<p>The site was originally submitted as part of the 'Call for sites'.</p> <p>Following a full site assessment it is considered that site ALAUD008 is not appropriate for allocation. There is flood risk on substantial part of site along the southerly edge. The settlement has limited access to services and potentially a moderate impact on biodiversity. The site contributes to the immediate setting of the settlement. Development at this location would also result in</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>

		<p>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. It is considered that the site is effective and can be delivered, and can contribute to meeting the LDP2's housing requirement. <b>(123)</b></p>	<p>elongating the settlement. The site is constrained within the Development and Landscape Capacity Study and it is considered that development of the site would impact negatively on the settlement approach from south. This is clearly a major issue to be addressed. Lauder has already two allocated housing sites with an indicative capacity of 130 units. The Reporter at a previous Local Plan Inquiry stated "development at this location would be less suitable than development on the west side of Lauder". At this point in time, it is not considered that there is any need for a further allocation within Lauder.</p> <p>In addition it is considered that there are other more appropriate sites available outwith the Strategic Development Areas and within the Northern Housing Market.</p> <p>As a result of the above, it is considered inappropriate to allocate site ALAUD008 Maitland Park Phase 2 within the Proposed LDP.</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</p>	<p>The site was originally submitted as part of the 'Call for sites'.</p> <p>Following a full site assessment it is considered that site AOXTO009 is not appropriate for allocation. The site lies to the south west of Oxton. It is considered that development at</p>	<p>It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.</p>

		<p>AOXTO013) would appear to be the better route of access to such a development. <b>(330)</b></p>	<p>this location would not integrate well with the rest of the settlement. Part of the site is affected by the HSE zoning. The Roads Planning Officer is unable to support development at this location. Within their response, the Roads Planning Officer stated: <i>“The Loan leading to the site often has extensive lengths of parking on the street which forces single file traffic over significant lengths all the way from the junction with the Main Street/Station Road and round the horizontal curve in the road. This already causes issues with traffic flow. Furthermore, junction visibility where The Loan joins Main Street/Station Road is restricted due to the close proximity of the corner building on the east side combined with the alignment of the Main Street/Station Road. There are no obvious solutions to these concerns and additional traffic would exacerbate the situation. If this site was to be allocated for housing, The Loan would have to be widened adjacent to the site and a footway and street lighting be provided. An extension of the 30 mph speed limit would also likely be required. A Transport Statement would be required to address accessibility and sustainable travel. All matters concerned I would find it difficult to offer my support for this proposed allocation”.</i></p>	
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			<p>In addition it is considered that there are other more appropriate sites available outwith the Strategic Development Areas and within the Northern Housing Market.</p> <p>As a result of the above, it is considered inappropriate to allocate site AOXTO009 South West of Oxton within the Proposed LDP.</p>	
Oxton	AOXTO010, Nether Howden	The contributor supports taking forward the site for housing development with an indicative capacity of 30 units. <b>(125)</b>	<p>Support noted.</p> <p>In light of the consultation responses received during the Main Issues Report public consultation and following further consideration the matter, it is recommended that site AOXTO010, Nether Howden is allocated for housing within the Proposed Local Development Plan. It is considered the most appropriate site for development within the village and unlike other proposals in the village has no technical objections regarding for example, roads or HSE zoning.</p>	It is recommended that the Council agree to allocate site AOXTO010 as a Housing site within the Proposed LDP.
Oxton	AOXTO010, Nether Howden	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>Comments noted.</p> <p>In the consideration of any site for inclusion in the Local Development Plan (LDP), a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment.</p>	<p>It is recommended that the Council agree to allocate site AOXTO010 as a Housing site within the Proposed LDP.</p> <p>It is also recommended that</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. <b>(119)</b></p>	<p>In doing this rigorous site assessment process, the best sites possible are identified. In respect to the site assessment undertaken for the site, it is noted that the Council's Flood and Coastal Management Team, Roads Planning and Scottish Water have all been consulted and have not objected to the potential allocation of the site in the Proposed Plan.</p> <p>In light of the consultation responses received during the Main Issues Report public consultation and following further consideration the matter, it is recommended that site AOXTO010, Nether Howden is allocated for housing within the Proposed Local Development Plan.</p> <p>It is noted that the following new site requirement is now required in taking the site forward:  <i>"Surface water to be managed through the use of Sustainable Urban Drainage Systems"</i>.</p> <p>In addition, it is also noted it is recommended that the Council include reference to foul water disposal within Volume 2 of the Proposed Plan.</p>	<p>the following additional site requirement is added:  <i>"Surface water to be managed through the use of Sustainable Urban Drainage Systems"</i>.</p> <p>In addition it is also recommended that reference to foul water disposal is made in relation to new sites within Volume 2 of the Proposed Plan.</p>
Oxton	AOXTO010, Nether Howden	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	It should also be noted that Scottish Planning Policy requires Local Development Plans (LDP) to allocate a range of sites which are	It is recommended that the Council agree to allocate site AOXTO010 as

		<p>small development of 5 houses currently being built in the old station yard. The key point here is that rather than Oxtan 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. 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. 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</p>	<p>effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>It is also noted that the Community Council raised that they supported some development at Oxtan to assist in supporting the services and facilities within the settlement.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Education, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>Furthermore, it should be noted that</p>	<p>a Housing site within the Proposed LDP.</p>
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		<p>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 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. <b>(329, 330)</b></p>	<p>the Council's Roads Planning Section have been consulted and have not objected to the potential allocation of site AOXT0010 as a housing site.</p> <p>It is noted that the adopted Local Development Plan 2016 states '<i>Development to the north and east of the settlement will be resisted where it would have significant effect on the international nature conservation value of the Leader Water or impact on the countryside setting of the settlement as viewed from the A68 trunk road</i>', however, it is not considered the Netherhowden site will impact on the Leader Water nor views from the A68 (as opposed to, for example, development on the open prominent areas around the Leader Water to the north and east of the village). It is therefore not considered there are any insurmountable issues in preventing the Netherhowden site being considered as an option for development.</p> <p>In light of the consultation responses received during the Main Issues Report public consultation and following further consideration the matter, it is recommended that site AOXT0010, Nether Howden is allocated for housing within the Proposed Local Development Plan</p>	
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			As a result of the above, it is considered appropriate to allocate site AOXTO010 within the Proposed LDP.	
Oxton	AOXTO009 South West of Oxton; AOXTO010 Nether Howden; AOXTO011 Former Railway; AOXTO012 Heriotfield South; AOXTO013 West of St Cuthbert's View; AOXTO014 North of Main Street; AOXTO015 Bridgend; AOXTO016 Oxton North West; AOXTO017 Oxton North East; AOXTO018 South of Justice Hall	<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.</p> <p>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"> <li>• School/Hall/Shop – (The contributor asks if they can consider and re-look at a 'Hub' accommodating these within one facility?)</li> <li>• 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</li> </ul>	<p>It is also noted that the Community Council support some development at Oxton to assist in supporting the services and facilities within the settlement.</p> <p>In the consideration of any site for inclusion in the Local Development Plan (LDP), a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Education, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>It is noted that the contributor submitted a number of new sites as part of the Main Issues Report consultation.</p> <p>It should be noted that the Council's Roads Planning Section have been</p>	It is recommended that the Council agree to allocate site AOXTO010 as a Housing site within the Proposed LDP.

		<ul style="list-style-type: none"> <li>• Utilities – The contributor asks if they can negotiate with Gas and Broadband suppliers' for new opportunities (Would the utilities cope with the increased demand this volume of housing and people would place on them?)</li> <li>• Roads &amp; Paths - must be reviewed and developed to incorporate the future development and enhance the existing paths, pavements, roads and lighting.</li> </ul> <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"> <li>• New Paths/Pavements (around Netherhowden)</li> <li>• Explore installing gas into the village as part of the plan</li> <li>• A68 junction is inadequate as is</li> <li>• No of house planned is too many for village and any A68 access. Smaller number overall with greater number of affordable houses</li> <li>• Huge need for mains gas – at present residents can't access dual-fuel deals and are held to ransom by LPG companies</li> <li>• Bus access must be protected</li> <li>• Need for road capacity to be considered – bridge at Netherhowden too narrow</li> </ul>	<p>consulted and have not objected to the potential allocation of site AOXTO010 as a housing site.</p> <p>In respect to the preferred site noted by the contributor – site AOXTO009, it is noted that that site was submitted for consideration as part of the Call for Sites process, for housing development. That site lies to the south west of Oxton. It is considered that development at this location would not integrate well with the rest of the settlement. In addition, the Roads Planning Officer is unable to support development at this location. Furthermore, part of the site is affected by the HSE zoning. Therefore, taking the above into consideration, the site cannot be supported for inclusion within the Proposed Plan.</p> <p>In respect to site AOXTO013, it is noted that the hazard pipeline runs through the site and a Health and Safety Executive (HSE) PADHI+ assessment has been carried out via the HSE website. The outcome of this stated: HSE's Advice: Advise Against. The assessment indicates that the risk of harm to people at the proposed development site is such that HSE's advice is that there are sufficient reasons on safety grounds, for advising against the granting of planning permission in</p>	
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		<ul style="list-style-type: none"> <li>• Netherhowden road too narrow for increased traffic.</li> <li>• Infrastructure may not cope with increase.</li> </ul> <p>The contributor also states that in relation to:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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?</li> <li>• 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.</li> <li>• Sewage and water waste – Would the capacity of the burn cope with the increase.</li> </ul> <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). <b>(328)</b></p>	<p>this case.</p> <p>In light of the consultation responses received during the Main Issues Report public consultation and following further consideration the matter, it is recommended that site AOXTO010, Nether Howden is the most appropriate site to be allocated for housing within the Proposed Local Development Plan</p> <p>As a result of the above, it is considered appropriate to allocate site AOXTO010 within the Proposed LDP.</p>	
Peebles	General	The contributors object to the proposed number of housing developments in the Peebles area. This is an unbalanced and ill thought out plan, without	It should be noted that it is not intended that all of the sites identified within the Main Issues	No further action required.

		<p>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. 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. Excessive housing development will ruin the attractiveness of the town, and turn Peebles into a dormitory town. 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</p>	<p>Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that "<i>it is not anticipated the LDP2 will require a significant number of new housing sites</i>". The purpose of the MIR was to identify a number of site options and present those to the public so that Local Development Plan (LDP) 2 could then be informed by their responses.</p> <p>The Council must consider site allocation options in places where there is developer and market interest, thus the need to consider appropriate sites in and around Peebles.</p> <p>In addition, it should be noted that the Council are also required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas.</p> <p>Scottish Planning Policy requires LDP's to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure</p>	
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		<p>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</p>	<p>to provide a plan-led system.</p> <p>Whilst the primary responsibility for operating the development planning system for the Scottish Borders lies with the Council, Circular 6/2013 Development Planning states that all interests should be engaged as early and as fully as possible. In addition that document also states “<i>key agencies are under a specific duty to co-operate in the preparation of development plans</i>”; this includes Scottish Natural Heritage, Scottish Environmental Protection Agency, Scottish Water and NHS (Health Board). The Council have consulted with all key agencies throughout the Local Development Plan process and will continue to do so. This then allows key agencies to plan according to their needs and demands also.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Education, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many</p>	
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		<p>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> <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>issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>NHS Borders have stated that they will continue to engage with SBC colleagues to provide primary care and public health input to the wider planning process including the creation of the next Scottish Borders Council Local Development Plan early in its preparation cycle as part of a Health in All Policies approach.</p> <p>Furthermore, it is noted that the Council's Education, Landscape, and Roads Planning sections, as well as Historic Environment Scotland and Scottish Natural Heritage have been consulted. It is noted that none of these consultees objected to the potential allocation of the sites contained within the MIR.</p> <p>It should be noted that the MIR states that: "<i>Improvements to the road network and public transport must continue to be supported</i>". Furthermore, it is also noted that road improvements have recently been undertaken at Dirtpot Corner.</p> <p>In respect to comments regarding to that future road expansion might take place along old railway tracks,</p>	
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		<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. <b>(16, 18, 25 (2 of 2), 36, 108 (1 &amp; 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)</b></p>	<p>currently under use/development as cycling, walking and riding routes; it should be noted that these paths are protected under the Policy EP12 Green Networks.</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. <b>(24 (2 of 2))</b></p>	<p>Comments noted.</p> <p>However, the SESPlan requires strategic growth in the Scottish Borders to be directed to three Strategic Development Areas (SDA), in the Central Borders, the Western Borders and the Eastern Borders.</p> <p>Peebles is a town with developer and market interest and the Council must consider development options in and around it.</p> <p>It should be noted that it is not intended that all of the sites</p>	No further action required.

			<p>identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that "<i>it is not anticipated the LDP2 will require a significant number of new housing sites</i>". The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>It should also be noted that Scottish Planning Policy requires Local Development Plans to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</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. 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. 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</p>	<p>It should be noted that it is not intended to allocate all of the sites identified within the Main Issues Report within the Proposed Local Development Plan (LDP).</p> <p>The SESPlan requires strategic growth in the Scottish Borders to be directed to three Strategic Development Areas (SDA) in the</p>	No further action required.



		<p>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 infrastructure plan that is endorsed by providers and Peebles Community Council as adequate.</p> <p>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. <b>(73)</b></p>	<p>Central Borders, the Western Borders and the Eastern Borders.</p> <p>It should also be noted that Scottish Planning Policy requires LDP's to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system. In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape. In doing this rigorous site assessment process, the best sites possible are identified.</p> <p>In relation to the Development Options Study, it is noted that that document was carried out by</p>	
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			<p>consultants to identify site options within the vicinity of Peebles. The study findings have informed the potential site options set out in the Main Issues Report (MIR). Paragraph 65 of the Planning Circular 6/2013: Development Planning, states that the MIR is the key consultation document in terms of front loading effective engagement on the Plan.</p> <p>It should also be noted, that the MIR did not identify any additional sites south of the River Tweed for allocation in the short term.</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</p>	<p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that "<i>it is not anticipated the [Local Development Plan] LDP2 will require a significant number of new housing sites</i>". The purpose of the MIR was to identify a number of site options and present those to the public so that Local Development Plan (LDP) 2 could then be informed by their responses.</p> <p>In addition, it should be noted that the Council are also required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas.</p>	No further action required.

		<p>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</p>	<p>Scottish Planning Policy requires LDP's to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>The Council must consider site allocation options in places where there is developer and market interest, thus the need to consider appropriate sites in and around Peebles.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Education, Economic Development, Landscape, Scottish Water, Scottish Natural Heritage, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues</p>	
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		<p>Edinburgh - this should be 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.  <b>(158, 175, 178, 179, 200, 201, 243, 282, 292)</b></p>	<p>such as archaeology, biodiversity, flood risk and landscape.</p> <p>Whilst the primary responsibility for operating the development planning system for the Scottish Borders lies with the Council, Circular 6/2013 Development Planning states that all interests should be engaged as early and as fully as possible. In addition that document also states “<i>key agencies are under a specific duty to co-operate in the preparation of development plans</i>”; this includes Scottish Natural Heritage, Scottish Environmental Protection Agency, Scottish Water and NHS (Health Board). The Council have consulted with all key agencies throughout the LDP process and will continue to do so. This then allows key agencies to plan according to their needs and demands also.</p> <p>It should be noted that additional discussion has been carried out with the Education Officer who has stated that there is sufficient school capacity available to accommodate the new proposals contained within Proposed LDP.</p> <p>In relation to comments regarding the need for a new bridge, it should be noted that the longer term sites identified within the current LDP that are located on the south of the River</p>	
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			<p>– SPEEB003, SPEEB004 and SPEEB005 are all subject to a site requirement for the provision of a new bridge. The Council accepts that for these sites and for any other potential new sites south of the River Tweed at Peebles, these too would be dependent on a new bridge. The Council has included the requirement for a new bridge within its Capital Plan and have allocated funding towards taking that project forward from 2028. However, it should be noted that further public consultation on that project is required. It should also be noted, that the MIR did not identify any additional sites south of the River Tweed for allocation in the short term.</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. <b>(111, 114)</b></p>	<p>It should be noted that the Council's Roads Planning section have stated that: <i>“Without a second Tweed crossing in the town, to reduce traffic flow on the existing bridge and take intrusive traffic away from the town centre, the addition of development traffic to the network will have congestion and environmental issues for the High Street, as well as capacity issues for Tweed Bridge, and this could compromise road safety. The most recent traffic count on behalf of the Council for Tweed Bridge was undertaken in November 2018 and through this it was demonstrated</i></p>	No further action required.

			<p><i>that the bridge is getting close to capacity. It is the Council's opinion that Tweed Bridge does not have the capacity to serve any new development in the town, over and above the sites allocated in the plan, with the exception of small infill proposals and other low traffic generating proposals which will be considered on a case by case basis. Longer term development in the town will be required to contribute towards a second river crossing based on projected costs. At this point in time there is no definitive date as to when the new bridge might be constructed and a feasibility study must be prepared in advance".</i></p> <p>In respect to comments regarding flooding, it should be noted that the SEPA Flood Maps indicate that there are areas at risk of flooding within Peebles and particularly so along the River Tweed corridor.</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.</p> <p>Sites SPEEB008 and SPEEB009 do not provide</p>	<p>It should be noted that the Council are required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas. Scottish Planning Policy requires the Local Development Plan (LDP) to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10</p>	No further action required.

		<p>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> <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. <b>(127 (1 of 3), 181, 203, 273)</b></p>	<p>from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that <i>“it is not anticipated the LDP2 will require a significant number of new housing sites”</i>. The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>It should also be noted, that the MIR did not identify any additional sites south of the River Tweed for allocation in the short term.</p> <p>It should also be noted that it is recommended that a new site is proposed for allocation at Peebles, site APEEB056 Land South of Chapelhill Farm for housing within the Proposed LDP (refer to below). It is noted that that site is located on the northern side of the River Tweed.</p>	
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			<p>In relation to comments regarding the need for a new bridge, it should be noted that the longer term sites identified within the current LDP that are located on the south of the River – SPEEB003, SPEEB004 and SPEEB005 are all subject to a site requirement for the provision of a new bridge. The Council accepts that for these sites and for any other potential new sites south of the River Tweed at Peebles, these too would be dependent on a new bridge. The Council has included the requirement for a new bridge within its Capital Plan and have allocated funding towards taking that project forward from 2028. However, it should be noted that further public consultation on that project is required.</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</p>	<p>The site was submitted as part of the 'Call for Sites' and as part of the Main Issues Report (MIR) public consultation.</p> <p>Following a full site assessment it is considered that site APEEB049 is not appropriate for allocation. Whilst the site is an acceptable site for development, SEPA have stated that a flood risk assessment would be required. The site would have a potential minor impact on biodiversity; the site is located on the edge of the settlement and has good access to services and</p>	<p>It is recommended that the Council agree to not allocate this site within the Proposed LDP.</p> <p>It is also recommended that the Council agree to continue to identify site SPEEB003 South West of Whitehaugh as a potential longer</p>



		<p>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. 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. <b>(114)</b></p>	<p>facilities; consideration should be given to the design of the overall site to take account of the Special Landscape Area, the adjacent SBC Garden and Designed Landscape and the setting of the adjacent Scheduled Monument. Additional landscape enhancement would also be required along with buffers to existing and proposed landscaping. Mitigation measures are required to prevent any impact on the River Tweed SAC/SSSI. Further assessment on nature conservation interest will also be required and mitigation put in place. Development should not take place in the required buffer area of the Scheduled Monument but rather that area should be left as open space. Enhancement of the footpath would also be required. Roads Planning also state that development at this location is reliant on a new crossing over the Tweed, vehicular linkage between the end of Glen Road and the roundabout at the southern end of Whitehaugh Park as well as the upgrading of Glen Road adjacent to Forest View. It is considered that there are constraints at present to the development of this site, which require further investigation, for example the river crossing. This site will remain as an identified longer term option for housing in the future, and allow time for further</p>	<p>term housing site within the Proposed LDP.</p>
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			<p>investigations regarding a river crossing.</p> <p>In addition it is considered that there are other more appropriate sites available within the Western Strategic Development Area and within the Northern Housing Market.</p>	
Peebles	APEEB054 East of Kittlegary View	<p>The contributor objects to the MIR in that it does not identify site APEEB054 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 before the site can be allocated. Again, based on technical assessment undertaken, this is a position that the contributor fundamentally disagrees with. <b>(111)</b></p>	<p>The site was submitted as part of the 'Call for Sites' and as part of the Main Issues Report (MIR) public consultation.</p> <p>Following a full site assessment it is considered that site APEEB054 is not appropriate for allocation. The western part of the proposed site forms part of a larger site (SPEEB005), identified for potential longer term mixed use development within the Local Development Plan (LDP). However, the eastern part of the proposed site is not identified for longer term development. There are a number of constraints regarding the site. SEPA have raised flood risk issues and request that the site is removed from the LDP. The Ecology Officer advises that there are major biodiversity risks. There is potential archaeology constraints within the site. In respect of landscape, the site is located within the Tweed Valley SLA and is constrained within the Landscape Capacity Study. The Roads Planning Officer has advised that</p>	<p>It is recommended that the Council agree to not allocate this site within the Proposed LDP.</p> <p>It is also recommended that the Council agree to continue to identify site SPEEB005 Peebles East (South of the River) as a potential longer term mixed use site within the Proposed LDP.</p>

			<p>development in this location is reliant on a new crossing over the River Tweed, but some development could be brought forward to meet a need for employment land.</p> <p>It is acknowledged that the site within the LDP is identified for potential mixed use development which could incorporate a mixture of housing and employment uses. The site put forward is solely for housing development and omits a small parcel of land, which the applicant states could be for future employment use. Given the lack of employment land within the Central Tweeddale area it is considered more appropriate to retain this as a mixed use allocation, which would allow the provision of both housing and employment opportunities in the future. Taking into consideration the above constraints, including the requirement for an additional river crossing, the site will not be included within the Proposed LDP. However, site SPEEB005 will be retained in the LDP as a potential longer term mixed use site. This will allow time for further investigations to be undertaken regarding the flood risk concerns and new bridge crossing requirement.</p> <p>In addition it is considered that there are other more appropriate sites</p>	
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			available within the Western Strategic Development Area and within the Northern Housing Market.	
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).</p> <p><b>(6 (2 of 2), 65, 101, 206)</b></p>	<p>Support and comments noted.</p> <p>In light of the consultation responses received during the Main Issues Report public consultation and following further consideration the matter, it is recommended that site APEEB056 Land South of Chapelhill Farm is allocated for housing within the Proposed Local Development Plan.</p>	It is recommended that the Council agree to allocate this site within the Proposed LDP.
Peebles	APEEB056 Land South of Chapelhill Farm	<p>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. <b>(181)</b></p>	<p>Comments noted.</p> <p>However, it is noted that the Main Issues Report (MIR) in paragraph 3.3 notes that "<i>it is not anticipated the [Local Development Plan] LDP2 will require a significant number of new housing sites</i>". It should also be noted, that the MIR did not identify any additional sites south of the River Tweed for allocation in the short term, those identified within the MIR were for long term only.</p> <p>In light of the consultation responses received during the MIR public consultation and following further consideration the matter, it is recommended that site APEEB056 Land South of Chapelhill Farm is</p>	It is recommended that the Council agree to allocate this site within the Proposed LDP.

			allocated for housing within the Proposed Plan.	
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</p>	<p>It should be noted that the Council are required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas. Scottish Planning Policy requires the Local Development Plan (LDP) to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>The Council must consider site allocation options in places where there is developer and market interest, thus the need to consider appropriate sites in and around Peebles.</p> <p>It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that "<i>it is not anticipated the LDP2 will require a significant number of new housing sites</i>". The</p>	It is recommended that the Council agree to allocate this site within the Proposed LDP.

		<p>detached from the rest of Peebles and would have a detrimental impact upon the landscape setting of the town.</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 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</p>	<p>purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Education, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>Furthermore, it should be noted that the Council's Roads Planning Section and Network Manager have been consulted. It is noted that neither of these consultees objected to the potential identification of site SPEEB009 as a potential longer term housing site subject to a number of requirements. It is noted that the Roads Planning section have stated: "<i>Any development at the north end of</i></p>	
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		<p>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 of 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. 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.  <b>(30, 46, 80, 111, 112, 155, 197, 236, 317)</b></p>	<p><i>Peebles will be reliant upon improved vehicular linkage being provided over the Eddleston Water between Rosetta Road and the A703. This should ideally be provided between Kingsland Square and Dalatho Street, but there may be other acceptable opportunities further north. Third party land ownership will be an issue. ... Some minor road improvement work may be required to Rosetta Road leading to the site from the town to facilitate the flow of traffic and the existing public road through the site will likely need to be modified to accommodate the development. A Transport Assessment would be required to identify and address transport impacts and to demonstrate sustainable travel is achievable".</i></p> <p>It should also be noted that both the Council's Landscape section and Scottish Natural Heritage have been consulted and neither have objected to the potential inclusion of the site within the Plan.</p> <p>It is noted that the Council is progressing on the review of the school estate. In respect to that review, the Council at their meeting of 29 November 2018 agreed the indicative sequence and priority for investment as follows: Galashiels,</p>	
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			<p>Hawick, Selkirk and Peebles. That report noted that the property maintenance issues are not as significant for Selkirk or Peebles, however, both will still require expenditure; and due to potential role and capacity pressures particularly at Peebles the priority of strategic plans beyond Galashiels will continue to be re-assessed in a proactive manner. However, following the major fire at Peebles High School in November 2019, the Council has had to revise its capital plans, to not only replace what was lost, but maximise the opportunities to enhance facilities on the site. This has been undertaken in parallel with the planned significant concurrent investment to deliver new Community Campuses in Galashiels and Hawick.</p> <p>It should also be noted that additional discussion has been carried out with the Education Officer who has stated that there is sufficient school capacity available to accommodate the new proposals contained within LDP2.</p> <p>Whilst the primary responsibility for operating the development planning system for the Scottish Borders lies with the Council, Circular 6/2013 Development Planning states that all interests should be engaged as</p>	
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			<p>early and as fully as possible. In addition that document also states “key agencies are under a specific duty to co-operate in the preparation of development plans”; this includes Scottish Natural Heritage, Scottish Environmental Protection Agency, Scottish Water and NHS (Health Board). The Council have consulted with all key agencies throughout the LDP process and will continue to do so. This then allows key agencies to plan according to their needs and demands also. NHS Borders have stated that they will continue to engage with SBC colleagues to provide primary care and public health input to the wider planning process including the creation of the next Scottish Borders Council LDP early in its preparation cycle as part of a Health in All Policies approach.</p> <p>In light of the consultation responses received during the MIR public consultation and following further consideration the matter, it is recommended that site APEEB056 Land South of Chapelhill Farm is allocated for housing within the Proposed Plan.</p>	
Peebles	APEEB056 Land South of Chapelhill Farm	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,	It should be noted that the Council are required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas. Scottish Planning Policy requires the Local Development	It is recommended that the Council agree to allocate this site within the Proposed LDP.

		<p>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. 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. <b>(108 (2 of 2))</b></p>	<p>Plan (LDP) to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Education, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>Furthermore, it should be noted that the Council's Roads Planning Section and Network Manager have been consulted. It is noted that neither of these consultees objected</p>	
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			<p>to the potential identification of site SPEEB009 as a potential longer term housing site subject to a number of requirements. It is noted that the Roads Planning section have stated: <i>“Any development at the north end of Peebles will be reliant upon improved vehicular linkage being provided over the Eddleston Water between Rosetta Road and the A703. This should ideally be provided between Kingsland Square and Dalatho Street, but there may be other acceptable opportunities further north. Third party land ownership will be an issue. ... Some minor road improvement work may be required to Rosetta Road leading to the site from the town to facilitate the flow of traffic and the existing public road through the site will likely need to be modified to accommodate the development. A Transport Assessment would be required to identify and address transport impacts and to demonstrate sustainable travel is achievable”</i>.</p> <p>In addition, the Scottish Environment Protection Agency (SEPA) and the Council’s Flood and Coastal Management Team were consulted as part of the site assessment process undertaken for the site. Neither consultee have</p>	
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			<p>objected to the potential inclusion of the site within the Plan.</p> <p>It should also be noted that whilst the site is currently in agricultural use for grazing however, the land is not identified as Prime Quality Agricultural Land. The identification of some greenfield / agricultural land is inevitable.</p> <p>In light of the consultation responses received during the MIR public consultation and following further consideration the matter, it is recommended that site APEEB056 Land South of Chapelhill Farm is allocated for housing within the Proposed Plan.</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. 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</p>	<p>It should be noted that the Council are required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas. Scottish Planning Policy requires the Local Development Plan (LDP) to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p>	<p>It is recommended that the Council agree to allocate this site within the Proposed LDP.</p>

		<p>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. <b>(318)</b></p>	<p>The Council must consider site allocation options in places where there is developer and market interest, thus the need to consider appropriate sites in and around Peebles.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Education, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>Furthermore, it should be noted that the Council's Roads Planning Section and Network Manager have been consulted. It is noted that neither of these consultees objected to the potential identification of site SPEEB009 as a potential longer term housing site subject to a number of requirements. It is noted that the Roads Planning</p>	
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			<p>section have stated: “Any development at the north end of Peebles will be reliant upon improved vehicular linkage being provided over the Eddleston Water between Rosetta Road and the A703. This should ideally be provided between Kingsland Square and Dalatho Street, but there may be other acceptable opportunities further north. Third party land ownership will be an issue. ... Some minor road improvement work may be required to Rosetta Road leading to the site from the town to facilitate the flow of traffic and the existing public road through the site will likely need to be modified to accommodate the development. A Transport Assessment would be required to identify and address transport impacts and to demonstrate sustainable travel is achievable”.</p> <p>It should also be noted that both the Council’s Landscape section and Scottish Natural Heritage have been consulted and neither have objected to the potential inclusion of the site within the Plan.</p> <p>In light of the consultation responses received during the Main Issues Report public consultation and following further consideration the matter, it is recommended that site</p>	
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			APEEB056 Land South of Chapelhill Farm is allocated for housing within the Proposed Plan.	
Peebles	APEEB056 Land South of Chapelhill Farm	The contributor states that they agree with the identification of site APEEB05. (It is considered that the contributor is actually referring to site APEEB056). <b>(283)</b>	Support noted. In light of the consultation responses received during the Main Issues Report public consultation and following further consideration the matter, it is recommended that site APEEB056 Land South of Chapelhill Farm is allocated for housing within the Proposed Local Development Plan.	It is recommended that the Council agree to allocate this site within the Proposed LDP.
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 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</p>	<p>Comments and support noted. In light of the consultation responses received during the Main Issues Report (MIR) public consultation and following further consideration the matter, it is recommended that site APEEB056 Land South of Chapelhill Farm is allocated for housing within the Proposed Local Development Plan.</p> <p>It should be noted that a developer requirement was already attached to the site within the MIR to ensure that a maintenance buffer strip of at least 6 metres wide is provided between the watercourse and built development.</p> <p>It is noted that the following site requirements are now required in taking the site forward:</p> <ul style="list-style-type: none"> <li>• Additional water quality buffer</li> </ul>	<p>It is recommended that the Council agree to allocate this site within the Proposed LDP.</p> <p>It is further recommended that the following site requirements are also added to the Plan in relation to site APEEB056:</p> <ul style="list-style-type: none"> <li>• Additional water quality buffer strips may also be required</li> <li>• The watercourse (tributary of the Eddleston Water) adjacent to the site</li> </ul>

		<p>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. 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. <b>(119)</b></p>	<p>strips may also be required</p> <ul style="list-style-type: none"> <li>• The watercourse (tributary of the Eddleston Water) adjacent to the site should be protected and enhanced as part of any development</li> <li>• Consideration to be 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</li> <li>• Provision of Sustainable Urban Drainage feature onsite.</li> </ul>	<p>should be protected and enhanced as part of any development</p> <ul style="list-style-type: none"> <li>• Consideration to be 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</li> <li>• Provision of Sustainable Urban Drainage feature onsite.</li> </ul>
Peebles	APEEB056 Land South of Chapelhill Farm	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	Comments noted. It should be noted that the SESPlan requires strategic growth in the Scottish Borders to be directed to	It is recommended that the Council agree to allocate this site within the



		<p>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). <b>(126 (1&amp;2 of 3))</b></p>	<p>three Strategic Development Areas (SDA) in the Central Borders, the Western Borders and Berwickshire.</p> <p>It should also be noted that Scottish Planning Policy requires Local Development Plans to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>In respect to site APEEB056, it is noted that the following relevant site requirements are required in taking the site forward:</p> <ul style="list-style-type: none"> <li>• Would require improved vehicular linkage over the Eddleston Water between Rosetta Road and the A703 (Preferred route is between Kingsland Road and Dalatho Street)</li> <li>• Pedestrian infrastructure would need to be extended out from the town to the site. Option could include provision of access via Standalane View. This matter requires to be investigated further</li> </ul>	<p>Proposed LDP.</p>
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			<ul style="list-style-type: none"> <li>• Transport Assessment is required for any development.</li> </ul> <p>In light of the consultation responses received during the Main Issues Report public consultation and following further consideration the matter, it is recommended that site APEEB056 Land South of Chapelhill Farm is allocated for housing within the Proposed Local Development Plan.</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 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"> <li>• Active frontages along the Chapelhill Farm road.</li> <li>• Pedestrian and cycle access and links to existing networks to the town centre should be established.</li> </ul>	<p>Comments noted.</p> <p>In the consideration of any site for inclusion in the Local Development Plan (LDP), a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>In respect to comments regarding to potential landscape impacts; it is noted that neither the Council's Landscape Architect nor Scottish Natural Heritage have objected to</p>	<p>It is recommended that the Council agree to allocate this site within the Proposed LDP.</p> <p>It is also recommended that the following site requirements are also included within the Plan:</p> <ul style="list-style-type: none"> <li>• It is intended that a Planning Brief in the form of Supplementary Planning Guidance will be produced for this site</li> <li>• Protect and enhance existing</li> </ul>

		<ul style="list-style-type: none"> <li>• Boundary planting along the eastern boundary should be established to maintain the rural setting of views from the A703. <b>(213)</b></li> </ul>	<p>the potential allocation of the site.</p> <p>In light of the consultation responses received during the Main Issues Report public consultation and following further consideration the matter, it is recommended that site APEEB056 Land South of Chapelhill Farm is allocated for housing within the Proposed Local Development Plan.</p> <p>It should be noted that in relation to pedestrian and cycle access, it is noted that a Transport Assessment will be required for the site, and in addition to that the following site requirement has been included:</p> <ul style="list-style-type: none"> <li>• Pedestrian infrastructure would need to be extended out from the town to the site. Option could include provision of access via Standalane View. This matter requires to be investigated further.</li> </ul> <p>In respect to the issues raised by the contributor in relation to the proposed design and layout of the site, it should be noted that it is recommended to include the following site requirements within the Proposed Local Development Plan:</p> <ul style="list-style-type: none"> <li>• It is intended that a Planning Brief in the form of Supplementary Planning</li> </ul>	<p>boundary features, where possible. Boundary planting along the eastern boundary should be established to maintain the rural setting of views from the A703.</p>
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			<p>Guidance will be produced for this site</p> <ul style="list-style-type: none"> <li>• Protect and enhance existing boundary features, where possible. Boundary planting along the eastern boundary should be established to maintain the rural setting of views from the A703.</li> </ul>	
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. <b>(126 (3 of 3))</b></p>	<p>The site was submitted as part of the Main Issues Report (MIR) public consultation.</p> <p>Following a full assessment of site APEEB057 it is not considered appropriate to allocate this site within the proposed Local Development Plan. It is noted that this site is part of the Rosetta Caravan Park.</p> <p>The site is located within the Peebles Development Boundary. The caravan park already contains two allocations, site MPEEB006 for mixed use with an indicative site capacity for 30 units; and site APEEB044 for housing with an indicative site capacity of 100 units. It is noted that at present no residential development has taken place on the site, however the Rosetta Road caravan and camping park remains onsite. Development of housing on all of the site would effectively result in the loss of the tourism/business asset. Economic</p>	<p>It is recommended that the Council agree to not allocate this site within the Proposed LDP.</p>

			<p>Development have stated that housing at this location would result in the loss of the tourism asset from the site. There is currently a demand for tourism accommodation within the Tweed Valley and therefore it's vital that we retain accommodation such as this site which can offer choice to meet consumer demands - which in turn improves occupancy levels, in particular, out of main season. Currently the mixed use site proposal offers direct employment in the locality. The site has good access to public transport, services and access to employment. There is the potential for archaeology on the site and caution is required to ensure that the setting of Rosetta House is not adversely affected as well as the landscape. The site lies within the Special Landscape Area.</p> <p>It should be noted that it is not intended that all of the sites identified within the MIR for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that "<i>it is not anticipated the LDP2 will require a significant number of new housing sites</i>". The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p>	
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			Furthermore it is considered that there are other more appropriate sites available within the Western Strategic Development Area. As a result of the above, it is considered inappropriate to allocate site APEEB057 within the Proposed LDP.	
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. 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. 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. The proposed housing development has limited</p>	<p>The site was submitted as part of the Main Issues Report (MIR) public consultation.</p> <p>Following a full site assessment it is considered that site APEEB058 is not appropriate for allocation. An enlarged site at this location was previously considered as part of the Local Development Plan (LDP) Examination and the Reporter did not bring that site forward. The main concern related to landscape fit. The Reporter stated that <i>'I must pay particular regard to this as the site is located within a Special Landscape Area. I agree with the Council that the existing settlement is well-contained at this point by rising topography to the east. I found that to be a very attractive feature of this important vehicular entrance to the town. Development of the site is likely to lead to the appearance of urban sprawl ascending the higher land to the east. I conclude overall that the potential benefits of increasing the land supply by allocation of this site are outweighed</i></p>	It is recommended that the Council agree to not allocate this site within the Proposed LDP.

		<p>impact on existing trees (one tree within the open grassland / meadow is removed and there are limited and localised tree removals associated with forming 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.</p> <p>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</p>	<p><i>by the likely significant adverse impact on the character and visual amenity of this sensitive settlement edge location'. It is considered that the site contributes greatly to the setting of the settlement.</i></p> <p>Development at this location would result in a negative impact particularly on the adjacent residential properties along the Peebles Road. The site is located within the SBC Venlaw Designed Landscape, and is adjacent to the category 'C' Venlaw Castle North Lodge. There is potential for archaeology on the site. The site is also within the SLA and would negatively impact on it. There is also the potential for negative impact on the residential amenity of neighbouring properties. The site is also constrained by access into the site. The Roads Planning Service are unable to support the development of the site, and have stated:</p> <p><i>"... This site has been considered previously as part of a larger site and a recent outline planning application was refused, in part due to road safety concerns, which are highlighted below:</i></p> <p><i>There is currently a vast proliferation of junctions onto this stretch of the A703 (Edinburgh Road). This is over and above the extent of on-street parking, private accesses to</i></p>	
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		<p>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. 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. <b>(127 (1, 2 &amp; 3 of 3))</b></p>	<p><i>individual dwellinghouses and nose-in parking associated with the commercial garage. In quick succession on the west side of the road there are junctions serving the garage, the filling station, the Crossburn Farm housing road and Crossburn Caravan Park. There is also a junction for the filling station onto the housing road close to its junction with the A703. On the east side of the A703 there is the junction serving Venlaw Farm and the former Venlaw Castle Hotel. This whole situation is far from ideal in that junction visibility splays overlap. It is difficult for a driver to pick out a junction, or make a fellow driver aware of which junction they are turning into. Stacking traffic for right turns into the junction on the east side of the road interferes with traffic waiting to turn right into the junctions on the west side of the road and vice versa.</i></p> <p><i>Traffic associated with this proposed site development site would exacerbate the situation described in the paragraph above. I have previously stated that a complete rationalisation of the junction arrangement in this location, with the co-operation of all interested parties, would be required in order to gain my support for any development on this site.</i></p> <p><i>Furthermore, the linear nature of the</i></p>	
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			<p><i>site now being considered would effectively result in a long cul-de-sac type road which is at odds with current policy such as 'Designing Streets' where well-connected street layouts, both internally and externally, are preferred".</i></p> <p>In addition it is considered that there are other more appropriate sites available within the Western Strategic Development Areas and within the Northern Housing Market.</p> <p>As a result of the above, it is considered inappropriate to allocate site APEEB058 within the Proposed LDP.</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</p>	<p>It is noted that the site was identified within the Main Issues Report (MIR) as a potential Longer Term Housing site, and it should be noted that it is not intended that all of the sites identified within the MIR for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that "<i>it is not anticipated the LDP2 will require a significant number of new housing sites</i>". The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>In the consideration of any site for inclusion in the LDP, a full site</p>	It is recommended that the Council agree not to identify this site for potential longer term housing within the Proposed Local Development Plan.

		<p>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</p>	<p>assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>Furthermore, it should be noted that the Council's Roads Planning Section and Network Manager have been consulted. It is noted that neither of these consultees objected to the potential identification of site SPEEB009 as a potential longer term housing site subject to a number of requirements. It should be noted that the Roads Planning Section have stated that: "... <i>Any further development on the south side of the River Tweed is reliant on a new river crossing due to issues over capacity, High Street amenity and the reliance on a single bridge for the south side of Peebles. ...</i>"</p> <p>It should also be noted that whilst the site is currently in agricultural use for grazing however, the land is</p>	
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		<p>that the contributor refers to site 'SPEEB004' in their submission 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</p>	<p>not identified as Prime Quality Agricultural Land. The identification of some greenfield / agricultural land is inevitable.</p> <p>Whilst it is noted that there are a number of constraints identified including flood risk, biodiversity, landscape character and infrastructure, many of which could be overcome in due course, it is considered that there are other more appropriate sites to take forward into the Proposed Plan.</p> <p>Following the MIR public consultation, and as a result of further consideration on the matter, it is proposed that this site SPEEB009 will not be taken forward into the Proposed Local Development Plan as a potential longer term housing site.</p>	
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		<p>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.</p> <p><b>(30, 46, 111, 127 (1 of 3), 145, 155, 157, 197, 200, 213, 221, 226)</b></p>		
Peebles	SPEEB009 East of Cademuir Hill	<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</p>	<p>It is noted that the site was identified within the Main Issues Report as a potential Longer Term Housing site, and it should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that “<i>it is not anticipated the [Local Development Plan] LDP2 will require a significant number of new housing sites</i>”. The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Education, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are</p>	<p>It is recommended that the Council agree not to identify this site for potential longer term housing within the Proposed Local Development Plan.</p>

		<p>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. <b>(108(2 of 2))</b></p>	<p>incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>It should also be noted that whilst the site is currently in agricultural use for grazing however, the land is not identified as Prime Quality Agricultural Land. The identification of some greenfield / agricultural land is inevitable.</p> <p>Furthermore, it should be noted that the Council's Roads Planning Section and Network Manager have been consulted. It is noted that neither of these consultees objected to the potential identification of site SPEEB009 as a potential longer term housing site subject to a number of requirements. It should be noted that the Roads Planning Section have stated that: "... <i>Any further development on the south side of the River Tweed is reliant on a new river crossing due to issues over capacity, High Street amenity and the reliance on a single bridge for the south side of Peebles. ...</i>"</p>	
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			<p>It should be noted that Scottish Environment Protection Agency (SEPA) and the Council's Flood and Coastal Management Team were consulted as part of the site assessment process undertaken for the site. Neither consultee have objected to the potential inclusion of the site within the Plan.</p> <p>Following the MIR public consultation, and as a result of further consideration on the matter, it is proposed that this site SPEEB009 will not be taken forward into the Proposed LDP as a potential longer term housing site.</p> <p>As a result of the above, it is considered inappropriate to identify site SPEEB009 within the Proposed LDP.</p>	
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	It is noted that the site was identified within the Main Issues Report (MIR) as a potential Longer Term Housing site, and it should be noted that it is not intended that all of the sites identified within the MIR for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that " <i>it is not anticipated the [Local Development Plan] LDP2 will require a significant number of new housing sites</i> ". The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2	It is recommended that the Council agree not to identify this site for potential longer term housing within the Proposed Local Development Plan.

		<p>Tweed. This proposal seems to be unrealistic and probably unworkable. <b>(318)</b></p>	<p>could then be informed by their responses.</p> <p>In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>Furthermore, it should be noted that the Council's Roads Planning Section and Network Manager have been consulted. It is noted that neither of these consultees objected to the potential identification of site SPEEB009 as a potential longer term housing site subject to a number of requirements. It should be noted that the Roads Planning Section have stated that: "... <i>Any further development on the south side of the River Tweed is reliant on a new river crossing due to issues over capacity, High Street amenity and the reliance on a single bridge</i></p>	
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			<p><i>for the south side of Peebles. ...”</i></p> <p>Whilst it is noted that there are a number of constraints identified including flood risk, biodiversity, landscape character and infrastructure, many of which could be overcome in due course, it is considered that there are other more appropriate sites to take forward into the Proposed Plan.</p> <p>Following the MIR public consultation, and as a result of further consideration on the matter, it is proposed that this site SPEEB009 will not be taken forward into the Proposed LDP as a potential longer term housing site.</p>	
Peebles	SPEEB009 East of Cademuir Hill	The contributor states that they agree with the identification of site APEEB009 East of Cademuir Hill. <b>(283)</b>	<p>Support noted.</p> <p>It is noted that there are a number of constraints identified including flood risk, biodiversity, landscape character and infrastructure, many of which could be overcome in due course. However, following the MIR public consultation, and as a result of further consideration on the matter, it is proposed that this site SPEEB009 will not be taken forward into the Proposed Local Development Plan (LDP). It is considered that there are other more appropriate sites that can be identified within the Proposed Plan within the Western Strategic</p>	It is recommended that the Council agree not to identify this site for potential longer term housing within the Proposed Local Development Plan.



			<p>Development Area.</p> <p>Furthermore, it is also noted that the Plan already identifies three potential longer term sites within Peebles and it is intended that those sites - SPEEB003, SPEEB004 and SPEEB005 will be retained within the Plan. Nevertheless, it is acknowledged that the site could be considered again for inclusion in a future LDP.</p> <p>As a result of the above, it is considered inappropriate to identify site SPEEB009 within the Proposed LDP.</p>	
Peebles	SPEEB009 East of Cademuir Hill	<p>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. <b>(282)</b></p>	<p>It is noted that the site was identified within the Main Issues Report (MIR) as a potential Longer Term Housing site, and it should be noted that it is not intended that all of the sites identified within the MIR for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that “<i>it is not anticipated the [Local Development Plan] LDP2 will require a significant number of new housing sites</i>”. The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their responses.</p> <p>In the consideration of any site for inclusion in the LDP, a full site</p>	<p>It is recommended that the Council agree not to identify this site for potential longer term housing within the Proposed Local Development Plan.</p>

			<p>assessment is carried out and the views of various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this rigorous site assessment process, the best sites possible are identified. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, as well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>Furthermore, it should be noted that the Council's Roads Planning Section and Network Manager have been consulted. It is noted that neither of these consultees objected to the potential identification of site SPEEB009 as a potential longer term housing site subject to a number of requirements. It should be noted that the Roads Planning Section have stated that: "... <i>Any further development on the south side of the River Tweed is reliant on a new river crossing due to issues over capacity, High Street amenity and the reliance on a single bridge for the south side of Peebles. ...</i>"</p> <p>Whilst it is noted that there are a number of constraints identified including flood risk, biodiversity,</p>	
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			<p>landscape character and infrastructure, many of which could be overcome in due course, it is considered that there are other more appropriate sites to take forward into the Proposed Plan.</p> <p>However, following the MIR public consultation, and as a result of further consideration on the matter, it is proposed that this site SPEEB009 will not be taken forward into the Proposed LDP as a potential longer term housing site.</p> <p>As a result of the above, it is considered inappropriate to identify site SPEEB009 within the Proposed LDP.</p>	
Peebles	SPEEB009 East of Cademuir Hill	<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 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 recommend that consideration is given to surface water runoff to ensure the site is not at risk of flooding and nearby development and</p>	<p>Support and comments noted.</p> <p>It is noted that the site was identified within the Main Issues Report (MIR) as a potential Longer Term Housing site, and it should be noted that it is not intended that all of the sites identified within the MIR for the Tweeddale Locality will be brought forward for development. The MIR in paragraph 3.3 notes that "<i>it is not anticipated the [Local Development Plan] LDP2 will require a significant number of new housing sites</i>". The purpose of the MIR was to identify a number of site options and present those to the public so that LDP2 could then be informed by their</p>	<p>It is recommended that the Council agree not to identify this site for potential longer term housing within the Proposed Local Development Plan.</p>

		<p>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. <b>(119)</b></p>	<p>responses.</p> <p>However, following the MIR public consultation, and as a result of further consideration on the matter, it is proposed that this site SPEEB009 will not be taken forward into the Proposed LDP as a potential longer term housing site.</p>	
Romannobridge	Romannobridge Infill	<p>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 dwelling houses that was refused. <b>(1 (1 of 3))</b></p>	<p>The Local Development Plan does not allocate sites of fewer than 5 units. Therefore any potential for development to take place would be through the processing of an application for planning permission.</p>	<p>It is recommended that the Council can consider this proposal through the Development Management Process.</p> <p>No further action at this time is required.</p>

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. <b>(112)</b></p>	<p>The site was submitted as part of the Main Issues Report (MIR) public consultation.</p> <p>It should be noted that the '<i>Western Rural Growth Area: Development Options Study</i>' that was undertaken to assist in identifying sites with the Western Strategic Development Area. Whilst Romannobridge is located within the Northern Housing Market Area, it is not located within the Western Strategic Development Area.</p> <p>Following a full site assessment it is considered that site AROMA004 is not appropriate for allocation. The site is located within a settlement that experiences a lack of services and facilities. In addition it is considered that there are other more appropriate sites available outwith the Strategic Development Areas and within the Northern Housing Market.</p> <p>This is a relatively large site in relation to the existing settlement. The site is within an open field and on the eastern side there is no natural boundary. It is considered that there are more appropriate sites for inclusion in the Proposed LDP but this site could be considered again for a future plan.</p>	It is recommended that the Council agree not to allocate this site within the Proposed Local Development Plan.
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			As a result of the above, it is considered inappropriate to identify site AROMA004 within the Proposed LDP.	
Skirling	SBSKI001 Skirling Development Boundary Amendment	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. <b>(324)</b>	<p>The site was submitted as part of the Main Issues Report public consultation.</p> <p>It is considered that the inclusion of the triangular piece of land (SBSKI001) appears a natural inclusion in the Development Boundary and follows the Conservation Area Boundary. However, this does not automatically mean that the site can be developed as a housing plot, as if, and when a planning application is submitted, a case must be put forward to ensure the protection of the mature tree on the northern part of the site which is protected under Conservation Area status.</p> <p>It is therefore considered that the Skirling Development Boundary should be amended within the Proposed Local Development Plan.</p>	It is recommended that the Council agree to extend the Development Boundary to include SBSKI001 within the Proposed Local Development Plan.
Skirling	ASKIR002 Parkfoot	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	<p>The site was submitted as part of the Main Issues Report public consultation.</p> <p>Following a full site assessment it is considered that site ASKIR002 is not appropriate for allocation. There are limited services available in Skirling and the settlement has</p>	It is recommended that the Council agree not to allocate site ASKIR002 within the Proposed Local Development Plan.

		<p>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. <b>(156)</b></p>	<p>limited access to employment opportunities. Development at this location would result in lessening the separation between to two parts of the settlement. The site is part of an open field with minimal natural landscape features. Whilst Roads Planning are able to support the site, upgrading of the private access track leading to the site may be required depending on the extent of the proposed development, and this may be affected by third party ownership. In addition it is considered that there are other more appropriate sites available outwith the Strategic Development Areas and within the Northern Housing Market.</p> <p>As a result of the above, it is considered inappropriate to identify site ASKIR002 within the Proposed Local Development Plan.</p>	
Stow	General	<p>The contributor considers that Stow must be a better priority for more housing due to the presence of the railway. <b>(300)</b></p>	<p>Comments noted. A number of sites have been assessed outwith the Strategic Development Areas, the sites within the Main Issues Report have been assessed as the most suitable.</p> <p>The current Adopted Local Development Plan allocates two housing sites as Stow, site ASTOW022 Craigend Road (10 Units) and ASTOW027 Stagehall II (12 units), and a mixed use site –</p>	No further action required.

			MSTOW001 Royal Hotel (11 units). It is noted that at present none of these sites have yet come forward for development.	
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. <b>(118 (1 of 2))</b></p>	<p>Following a full site assessment it is considered that site ASTOW029 is not appropriate for allocation. The site forms an important part of the setting of the settlement, and is constrained within the Development and Landscape Capacity Study. In addition, development at this location would result in extending higher into the hill than all other development. The Roads Planning section have raised concerns and are only able to support a minimum amount of development. Anything over 4 units will require the road to be brought up to an adoptable standard and it is not envisaged that this could be achieved. This is likely to include the provision of a possible new bridge over the Crunzie Burn and the access route via Earlston Road is narrow with a considerable level of on street parking and is not suitable to serve more houses. It should be noted that developments of less than 5 units will not be allocated within the Local Development Plan (LDP).</p> <p>However, it should be noted that in relation to roads standards regarding private accesses, the Proposed Local Development Plan</p>	It is recommended that the Council agree not to allocate site ASTOW029 within the Proposed Local Development Plan.



			<p>will state that: “A private access can serve a maximum of 5 dwelling units. ...” Therefore, it may be that the site could be reconsidered in the future. However, as the site was not included within the Main Issues Report, the site cannot be taken forward at this time.</p> <p>As a result of the above, it is considered inappropriate to identify site ASTOW029 within the Proposed LDP.</p>	
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. <b>(303)</b>	<p>It should be noted that site AWALK009 has been submitted for consideration for inclusion in the Plan with an indicative capacity of three units. It is noted that there is a recent approval at this location for one house. However, the Roads Planning Officer has stated that they are against this site being allocated for further development over and above that recently approved for a single dwellinghouse (application 18/00681/FUL). The road leading to the site is unsuitable to support any further development due to its restrictive geometry and steep gradient. In addition, the Local Development Plan (LDP) does not allocate sites smaller than five units.</p> <p>In addition it is considered that there are other more appropriate sites available outwith the Strategic Development Areas and within the</p>	It is recommended that the Council agree to not extend the Development Boundary and not include site AWALK009 at Walkerburn within the Proposed LDP.

			Northern Housing Market.  As a result of the above, it is considered inappropriate to identify site AWALK009 within the Proposed LDP.	
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. <b>(214)</b>	Comments and support noted.	No further action required.
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. <b>(240)</b>	It should be noted that the Main Issues Report did not identify any potential new housing sites for West Linton. It is therefore not proposed to allocate any additional housing sites other than those already allocated within the current Adopted Local Development Plan for the settlement of West Linton.	No further action required.
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	Following full site assessment, it is considered that the site would have a moderate impact on the local ecology. West Linton has a range of services and facilities and access to a potential employment site. The majority of the site is flat, exposed and open in character. Potential for archaeology on the site. The site is	It is recommended that the Council agree to not allocate this site within the Proposed LDP.

		<p>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. <b>(57)</b></p>	<p>constrained within the Development and Landscape Capacity Study undertaken for the settlement. The Roads Planning Officer is unable to support the site, for the following reasons: The road infrastructure in West Linton, and in particular Main Street, is not capable of supporting further development in the village unless some relief can be afforded. As such, any further housing in West Linton should be immediately to the east of Broomlee Crescent and will rely on street connectivity between Deanfoot Road and Station Road. Such linkage would offer some relief for Main Street.</p> <p>In addition it is considered that there are other more appropriate sites available outwith the Strategic Development Areas and within the Northern Housing Market.</p> <p>As a result of the above, it is considered inappropriate to identify site AWEST019 within the Proposed Local Development Plan.</p>	
West Linton	AWEST023 Medwyn Road West	<p>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 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</p>	<p>The site was submitted as part of the Main Issues Report public consultation.</p> <p>Following a full site assessment it is considered that site AWEST023 is not appropriate for allocation. The site would have a moderate impact on the ecology of the area,</p>	<p>It is recommended that the Council agree to not allocate this site within the Proposed LDP.</p>

		<p>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. <b>(106)</b></p>	<p>and West Linton has a range of services and facilities. Whilst the site is a relatively well contained field, there is the potential for archaeology and so evaluation would be required. The site is identified as constrained within the Development and Landscape Capacity Study, and is located within the Special Landscape Area. Roads Planning are unable to support the site. It is noted that the Roads Planning Section have stated: <i>“The road infrastructure in West Linton, and in particular Main Street, is not capable of supporting further development in the village unless some relief can be afforded. As such, any further housing in West Linton should be immediately to the east of Broomlee Crescent and will rely on street connectivity between Deanfoot Road and Station Road. Such linkage would offer some relief for Main Street.</i></p> <p><i>As well as serving residential properties, Medwyn Road serves farmland, Baddingsgill Reservoir and a busy golf course, but has no footway or street lighting provision. This combined with the site location being on the opposite side of the A702 Trunk Road from the town services would not be in the interests of sustainable transport as it would discourage walking and cycling and would place a reliance</i></p>	
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			<p><i>on car trips. Furthermore, the Medwyn Road and Lyne Park junctions onto the A702 are too close together and Medwyn Road, after its initial length, narrows down to an extent that the roadside verge is being overridden and damaged by passing vehicles.”</i></p> <p>Furthermore, it is noted that considerable housing has recently come forward through the Plan.</p> <p>In addition it is considered that there are other more appropriate sites available outwith the Strategic Development Areas and within the Northern Housing Market.</p> <p>As a result of the above, it is considered inappropriate to identify site AWEST023 within the Proposed Local Development Plan.</p>	
West Linton	AWEST024 Lintonbank	<p>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</p>	<p>The site was submitted as part of the Main Issues Report public consultation.</p> <p>Following a full site assessment it is considered that site AWEST024 is not appropriate for allocation. Development of the site would have a moderate impact on the ecology of the area, and West Linton has a range of services and facilities. The site sits within the SBC Lynedale / Medwyn Designed Landscape. There is the potential for</p>	<p>It is recommended that the Council agree to not allocate this site within the Proposed LDP.</p>

		Edinburgh Road to the south. <b>(311)</b>	<p>archaeology on site. The site is identified as constrained within the Development and Landscape Capacity Study, and is located within the Special Landscape Area. Roads Planning are unable to support development of the site, and have stated: <i>"The road infrastructure in West Linton, and in particular Main Street, is not capable of supporting further development in the village unless some relief can be afforded. As such, any further housing in West Linton should be immediately to the east of Broomlee Crescent and will rely on street connectivity between Deanfoot Road and Station Road. Such linkage would offer some relief for Main Street.</i></p> <p><i>Furthermore, this site in particular is somewhat disconnected from the rest of the village. There are too many constraints with the private road known as The Loan so that sole means of vehicular access would likely be from a new roundabout on the A702 Trunk Road outside the village (subject to Transport Scotland approval). The A702 Trunk Road through the village operates to a degree as a bypass and the site sits on the opposite side of it from the village services. A development of this scale would be expected to integrate well with the existing street network</i></p>	
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			<p><i>and there is very little opportunity for this.”</i></p> <p>Furthermore, it is noted that there has been considerable housing recently come forward through the Plan.</p> <p>In addition it is considered that there are other more appropriate sites available outwith the Strategic Development Areas and within the Northern Housing Market.</p> <p>As a result of the above, it is considered inappropriate to identify site AWEST024 within the Proposed Local Development Plan.</p>	
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## 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?



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Main Issue	Sub Issue	Summary of Main Issues Raised	Proposed Response to Main Issues Raised	Recommendation
Planning for Housing: Question 8	Agree with preferred option	The contributor supports the preferred option for housing in the countryside policy. <b>(60, 169, 171, 216, 230, 262, 263, 312)</b>	The Main Issues Report set out a preferred and alternative option for Policy HD2: Housing in the Countryside.	It is recommended that Policy HD2 is updated to include the changes to section d) 'Restoration of houses' and section e) 'Economic requirement', along with making reference to the importance of high quality design within the policy.
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. <b>(305)</b>	It is noted that there have been a variety of comments received in respect of Policy HD2. Taking on board the comments received, the Council make the following recommendations for the Proposed LDP which take account of all representations identified.	
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. <b>(274)</b>	All proposals must demonstrate high quality design that is responsive to its landscape context. The Council recommend that the existing policy on Part a) Building Groups is retained. It is acknowledged that in allowing individual houses outwith building groups, this could result in unsustainable sporadic development throughout the Scottish Borders. Such isolated/sporadic development in	
Planning for Housing: Question 8	Agree with preferred option	SEPA agree with the preferred option for addressing proposals for housing in the countryside. <b>(119)</b>		
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. <b>(206)</b>		

Planning for Housing: Question 8	Agree with preferred option	<p>The contributor agrees with the preferred option.</p> <p>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. <b>(289)</b></p>	<p>the countryside, no matter how well designed, will have a major cumulative impact on the intrinsic qualities of the Scottish Borders landscape.</p> <p>It is also proposed that the existing Part d) Restoration of Houses policy is relaxed from requiring the walls of the former house to be substantially intact (normally at least to wallhead height). The policy will be relaxed to allow the restoration of a derelict or former house provided that there is substantial physical evidence of a house remaining, which can be supported by documentary evidence, as well as meeting the criteria contained within the policy.</p>	
Planning for Housing: Question 8	Disagree with preferred option	<p>The contributor objects to the preferred option for housing in the countryside. <b>(95)</b></p>		
Planning for Housing: Question 8	Agree with alternative option	<p>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.</p> <p>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. <b>(24)</b></p>	<p>Furthermore, in respect of Part f) Economic Requirement, an additional paragraph has been added to the policy in respect of business plans: <i>'Where a house is proposed, with a location essential for business needs, an accompanying business case/justification will be required, which demonstrates the economic requirement for a house at this location'</i>. This additional paragraph will ensure that the required information is provided up front for</p>	
Planning for Housing: Question 8	Agree with alternative option	<p>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 materials are specified.</p>		

		<p>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. <b>(60)</b></p>	<p>consideration as part of any planning application.</p>	
<p>Planning for Housing: Question 8</p>	<p>Agree with alternative option</p>	<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>The importance of high quality design is re-emphasised within the policy text, which states that '<i>high quality design in all developments is critical</i>'.</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. <b>(101)</b></p>		
<p>Planning for Housing: Question 8</p>	<p>Agree with alternative option</p>	<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.</p> <p>Availability of housing is crucial to the economy of the Scottish Borders. The ability of the rural</p>		

		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 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. <b>(195)</b>		
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. <b>(165)</b>		
Planning for Housing: Question 8	Agree with alternative option	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;  <u>Economic potential for rural areas</u> <ul style="list-style-type: none"> <li>• Greater scope for prospective builders</li> </ul>		

		<ul style="list-style-type: none"><li>• More favourable than conversion/restoration</li><li>• 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</li><li>• Encourage more people to relocate to the countryside</li><li>• Allows innovative and interesting housing to be brought to the Scottish Borders</li><li>• Allow housing targets to be met more easily</li><li>• Economic benefits to rural communities</li><li>• 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</li></ul> <p><u>Avoidance of urban centric policies</u></p> <ul style="list-style-type: none"><li>• 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.</li></ul> <p><u>Sustainable travel</u></p> <ul style="list-style-type: none"><li>• Potential to cut down on travel distances and excessive use of private cars</li><li>• Allow people to build homes closer to their workplace which may cut car travel times</li></ul>		
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		<ul style="list-style-type: none"> <li>• Provides rural homes for people employed locally and therefore not commuting significant distances</li> <li>• Allowing stand-alone housing embedded into the landscape makes an attractive place to work (homework)</li> <li>• 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</li> </ul> <p><u>Rural de-population</u></p> <ul style="list-style-type: none"> <li>• 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</li> <li>• Bringing high quality design houses to the countryside makes rural areas more eye catching and interesting, and places where people would like to live.</li> </ul> <p>The contributor notes that cumulative build-up of single houses in certain areas should be avoided. <b>(132)</b></p>		
<p>Planning for Housing: Question 8</p>	<p>Agree with alternative option</p>	<p>The contributor supports the alternative approach. <b>(96, 276)</b></p>		

<p>Planning for Housing: Question 8</p>	<p>Agree with alternative option</p>	<p>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.</p> <p>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. <b>(210)</b></p>		
<p>Planning for Housing: Question 8</p>	<p>Agree with alternative option</p>	<p>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. <b>(294)</b></p>		
<p>Planning for Housing: Question 8</p>	<p>Agree with alternative option</p>	<p>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.</p> <p>Questions why new 'small settlements' are not supported. <b>(283)</b></p>		
<p>Planning for Housing: Question 8</p>	<p>Agree with alternative option</p>	<p>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</p>		



		energy/low waste homes in accordance with sustainability and climate change policies. <b>(215)</b>		
Planning for Housing: Question 8	Agree with alternative option	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 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. <b>(315)</b>		
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. <b>(277)</b>		
Planning for Housing: Question 8	Disagree with alternative option	The contributor objects to the alternative option for housing in the countryside. <b>(95)</b>		
Planning for Housing: Question 8	Disagree with preferred and alternative options	The contributor does not agree with the preferred or alternative option. <b>(170)</b>		
Planning for Housing: Question 8	Proposes an alternative option	<u>Suggested Improvements to existing policy</u> The contributor suggests improvements to the current 'housing in the countryside' policy. These are summarised and outlined below;		

		<ul style="list-style-type: none"><li>• 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</li><li>• 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</li><li>• 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</li><li>• Question the criterion, '<i>sites should not normally break into undeveloped fields</i>'</li><li>• The wording of the policy does leave some room for interpretation</li><li>• 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.</li></ul> <p><u>Isolated houses of exceptional quality</u> <u>(alternative option)</u></p>		
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		<ul style="list-style-type: none"> <li>• Consider that many parts of the Borders countryside are capable of absorbing individual houses without harm</li> <li>• 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</li> <li>• There is a need for people to live in the countryside, to care for it and to support village services.</li> </ul> <p><u>Non-farming/forestry businesses</u></p> <ul style="list-style-type: none"> <li>• There does not appear to be any room for other non-farming/forestry businesses</li> <li>• The countryside should not just be for farming and forestry, it could accommodate other small businesses.</li> </ul> <p><b>(144)</b></p>		
<p>Planning for Housing: Question 8</p>	<p>General</p>	<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</p>		

		developments do not have negative impacts on the network of paths and trails. <b>(196)</b>		
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. <b>(143)</b></p>		
Planning for Housing: Question 8	General	<p>The contributor raises concerns that housing in the countryside is an issue. Such housing can be disruptive 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</p>		

		of the Teviot must be recognised and have proper value placed upon it in terms of future tourism and biodiversity. <b>(146)</b>		
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,</p>		

		<p>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. <b>(327)</b></p>		
Planning for Housing: Question 8	General	The contributor states that town boundaries should be drawn and there should be limited expansion of these areas. <b>(147)</b>		
Planning for Housing: Question 8	General	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 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. <b>(168)</b>		
Planning for Housing: Question 8	General	The contributor states that brownfield sites should be preferred. <b>(173)</b>		
Planning for Housing: Question 8	General	The contributor states that any new housing should be restricted in the countryside. <b>(181)</b>		

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. <b>(190)</b>		
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. <b>(179)</b>		
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. <b>(200)</b>		
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. <b>(201)</b>		
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. <b>(214)</b>		
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. <b>(222)</b>		
Planning for Housing: Question 8	General	The contributor states that housing should be allowed on farm land or greenfield sites. <b>(251)</b>		
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. <b>(258)</b>		
Planning for Housing: Question 8	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. 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. <b>(287)</b>		
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. <b>(300)</b>		
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. <b>(241)</b>		
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. <b>(209)</b>		
Planning for Housing: Question 8	General	<p>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.</p> <p>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. <b>(156,264)</b></p>		
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. <b>(213)</b>		
Planning for Housing: Question 8	General	The contributor states that there should be no more housing in the countryside, farms are becoming property developers. <b>(27)</b>		
Planning for Housing: Question 8	General	The contributor questions how this proposal compares with how other Councils approach this issue, for example Aberdeenshire Council. <b>(231)</b>		
Planning for Housing: Question 8	General	<p>The contributor states that, we should actively promote any housing development and that the three house options severely limit this.</p> <p>The alternative option is a more realistic way of encouraging individuals who wish to build sensitively in more remote areas. <b>(291)</b></p>		

Planning for Housing: Question 8	General	<p>The contributor states questions how 250-300 units in a hamlet of 50 odd houses be deemed 'appropriate' in Eshiels.</p> <p>They cannot see the sense in restricting possibilities of helping meet the housing quota by rejecting the alternative provision – especially given the provisos stated. <b>(197)</b></p>		
Planning for Housing: Question 8	General	<p>The contributor agrees with the proposals for housing in the countryside. Stating, however there must be 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. <b>(318)</b></p>		
Planning for Housing: Question 8	General	<p>The contributor states that they strongly disagree with the proposals. <b>(194)</b></p>		
Planning for Housing: Question 8	General	<p>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. <b>(137)</b></p>		
Planning for Housing: Question 8	General	<p>The contributor feels this is a complete mistake. You will be losing a lovely area of countryside to houses that will look horribly dull. <b>(268)</b></p>		

## 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?

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Main Issue	Sub Issue	Summary of Main Issues Raised	Proposed Response to Main Issues Raised	Recommendation
Chesters	RC2B, Roundabout Farm	The contributor agrees with the removal of the allocation. <b>(299)</b>	Comments noted. The site was allocated for housing within the Roxburgh Village Plan (1996) up to the Local Development Plan 2016. Over this period, the size of the site has reduced due to piecemeal development. There is also a mature and prominent tree within the site and it is doubtful that the site could accommodate 5 new units.	It is recommended that the Council agrees that the site should not be proposed for inclusion in the Proposed Local Development Plan.
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.</p>	<p>Comments are noted.</p> <p>The new housing allocation (ACOPA008) was subject to a full site assessment and consultation.</p> <p>The site assessment noted that there are 2 allocated housing sites within Cockburnspath, which are not yet complete (BCO4B &amp; BCO10B). BCO4B lies directly to the south of the proposed site ACOPA008. Given that this site has only partially been developed and there are no building works currently on the site, it is considered that the allocation of any additional land to the north of BCO4B, at this moment in time, would be premature. It is considered</p>	It is recommended that the Council agree that the site should be retained within the Proposed Local Development Plan.

		<p>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. <b>(132)</b></p>	<p>that the site to the north should not be released until such time that BCO4B is complete, or near complete, in order to avoid a development to the north, which is effectively separated from the rest of Cockburnspath. It is noted that the applicant states in the submission, that if the Council considers 3 housing allocations too many in Cockburnspath, that the proposed site could substitute the existing allocation BCO10B. However, this does not address the issue that BCO4B should be complete (or near complete) before this site is considered for development to ensure that the settlement form develops sustainably.</p> <p>The submission questions the lack of delivery on BCO4B. However it should be noted that since the recession overall completion rates for the Scottish Borders have been low for marketability reasons.</p> <p>It is concluded that the allocation BCO10B will be retained within the LDP2.</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. <b>(158)</b>	It should be noted that the Council are required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas. Scottish Planning Policy requires Local Development Plans (LDP) to allocate a range of sites	It is recommended that the Council agree that site AEDDL002 - North of Bellfield should be retained within the Proposed Local

			<p>which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>Discussion has been undertaken with the Education department, and they have confirmed that the sites contained within the Proposed LDP can be accommodated. NHS Borders have stated that they will continue to engage with SBC colleagues to provide primary care and public health input to the wider planning process including the creation of the next Scottish Borders Council LDP early in its preparation cycle as part of a Health in All Policies approach.</p>	Development Plan.
Eddleston	TE6B, Burnside	All housing in Eddleston should be removed until you deal with the lack of provisions in the Schools, Doctors etc. <b>(158)</b>	It should be noted that the Council are required to allocate sufficient land within the Central, Eastern and Western Strategic Development Areas. Scottish Planning Policy requires Local Development Plans (LDP) to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic	It is recommended that the Council agree that site TE6B - Burnside should be retained within the Proposed Local Development Plan.

			<p>development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>Discussion has been undertaken with the Education department, and they have confirmed that the sites contained within the Proposed LDP can be accommodated. NHS have been consulted in the process. NHS Borders have stated that they will continue to engage with SBC colleagues to provide primary care and public health input to the wider planning process including the creation of the next Scottish Borders Council LDP early in its preparation cycle as part of a Health in All Policies approach.</p>	
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. <b>(10)</b>	Comments noted. It is acknowledged that there has been no recent interest in the housing allocation, however, the housing market has been particularly slow since the recession. Galashiels is located within the Central Housing Market Area and the settlement is a particular focus for development given the services and transport links available. Given this information, it is considered that the site should remain allocated for housing within the LDP2.	It is recommended that the Council agree that the site should be retained within the Proposed Local Development Plan.

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. <b>(10)</b>	Comments noted. It is acknowledged that there has been no recent interest in the housing allocation, however, the housing market has been particularly slow since the recession. Galashiels is located within the Central Housing Market Area and the settlement is a particular focus for development given the services and transport links available. Given this information, it is considered that the site should remain allocated for housing within the LDP2.	It is recommended that the Council agree that the site should be retained within the Proposed Local Development Plan.
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. <b>(10)</b>	Comments noted. The redevelopment of this site, which is located on the A7, should continue to be encouraged.	It is recommended that the Council agree that the site should be retained within the Proposed Local Development Plan.
Galashiels	AGALA029, Netherbarns	The contributor is surprised at the distinct lack of housing sites proposed in the Galashiels area, 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. <b>(24)</b>	Comments noted. Identifying land within Galashiels for housing development continues to be challenging, predominantly due to site constraints. However, there remain a number of allocated sites within the LDP in Galashiels and it is considered that those, alongwith the Netherbarns site referred to, will be sufficient to address the housing land requirement within the LDP period	AGALA029 to be included within the LDP
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	The Lilliesleaf, Ashkirk and Midlem Community Council made a representation to the MIR advising that the site has now been	It is recommended that the Council agrees that the site should not be



		removed from the housing allocation. <b>(93)</b>	purchased by the community in order to create a village green and sought that the housing allocation on the site is removed from the LDP. As a village, Lilliesleaf has lacked a central village green and this is a use and focus to be welcomed in the village. On this basis, it is considered that the housing allocation should be removed and replaced with a formal Key Greenspace allocation (GSLILL002). Thomson Cooper in their capacity as Administrators for Murray and Burrell Ltd have confirmed that the site has now been sold and now remove their previous support for the retained allocation of the site for housing development (see below).	proposed for inclusion in the Proposed Local Development Plan as a site for housing development. It is recommended that the Council agree that the site should be allocated for Key Greenspace (GSLILL002).
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. <b>(10)</b>	Comments noted (see above).	No action required. Refer to response above.
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"> <li>• The site is on the lower slopes of the Eildon Hills within an NSA and AGLV. <b>(2, 4, 5)</b></li> <li>• The site was considered, when allocated, to be a contained site that could fit into the landscape. This needs to be reconsidered. <b>(2, 4, 5)</b></li> <li>• The site is a sensitive boundary for wildlife and the town. <b>(2, 4, 5)</b></li> </ul>	This site is allocated within the Scottish Borders Local Development Plan 2016 for housing development. A recent planning application for the erection of 28 dwellinghouses on the site was approved by the Planning and Building Standards Committee on 1 July 2019. This is an effective housing site within a settlement which has a strong record of market demand. This allocation should be retained within the Proposed Local Development	It is recommended that the Council agree that the site should be retained within the Proposed Local Development Plan.

		<ul style="list-style-type: none"> <li>• Housing development on this land would undermine the scenic quality of the Eildon Hills which is important for the character of Melrose. <b>(2, 4, 5)</b></li> <li>• There are significant constraints on the site including: flooding, levels, civil engineering, traffic and ecology. <b>(2, 4, 5)</b></li> <li>• The site is only efficient if the land adjacent is allocated for development too, this opens the door to sprawl up the Eildon slopes. <b>(2, 4, 5)</b></li> <li>• The site could be deallocated without compromising the development needs of the Borders. <b>(2, 4, 5)</b></li> <li>• 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. <b>(2, 4, 5)</b></li> <li>• Development would destroy the scenic qualities which local people and tourists value greatly and would have a detrimental impact upon the local economy. <b>(5)</b></li> <li>• Development on the site would open the door to further development on the foothill of the Eildon Hills. <b>(5)</b></li> </ul>	Plan.	
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</p>	This site is allocated within the Scottish Borders Local Development Plan 2016 for housing development. A recent planning application for the erection of 28 dwellings on the site was approved by the Planning and Building Standards Committee on 1 July 2019. This is an effective housing site within a settlement which has a strong record of market demand. This	It is recommended that the Council agree that the site should be retained within the Proposed Local Development Plan.

		<p>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> <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'</p>	<p>allocation should be retained within the Proposed Local Development Plan.</p>	
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		<p>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</p>		
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		<p>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. <b>(143)</b></p>		
Melrose	Eildon View/Fairways	<p>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. <b>(143)</b></p>	<p>This site is allocated within the Scottish Borders Local Development Plan 2016 for housing development. A recent planning application for the erection of 28 dwellinghouses on the site was approved by the Planning and Building Standards Committee in July 2019. This is an effective housing site within a settlement which has a strong record of market demand. This allocation should be retained within the Proposed Local Development Plan. The land suggested at Eildon View/Fairways has not been submitted for consideration by the landowner and has not therefore been assessed as an option through this process.</p>	<p>It is recommended that the Council agrees that the site should not be proposed for inclusion in the Proposed Local Development Plan.</p>

Peebles	General	<p>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.</p> <p>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.</p> <p>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. <b>(150, 155, 185, 207)</b></p>	<p>It should be noted that it is not intended to remove any housing site from the Northern Housing Market Area. In addition, it should also be noted that the removal of housing sites in other parts of the Scottish Borders does not increase development pressure within Peebles.</p> <p>The Council are required to allocate sufficient land within each of the housing market areas within the Scottish Borders. In addition, Scottish Planning Policy requires Local Development Plans to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system.</p> <p>In relation to comments regarding Eddleston, it is noted that a new site is proposed for that settlement, site AEDDL010, Land south of the Cemetery.</p>	No further action required.
Peebles	APEEB031, George Place	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	<p>Comments are noted.</p> <p>The site is allocated for housing in the adopted Local Development</p>	It is recommended that the Council agree to retain site APEEB031 for

		<p>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 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. <b>(127 (1 of 3))</b></p>	<p>Plan (LDP) and it is proposed to be carried over into the Proposed LDP, with an indicative site capacity for 36 units.</p> <p>In respect to the use of brownfield/greenfield land, often brownfield sites have constraints that prevent their early development from taking place. Paragraph 119 of the Scottish Planning Policy (SPP) states “... <i>In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met</i>”.</p> <p>Whilst it is noted that previously developed brownfield land in built-up areas must continue to play a vital role for a range of purposes including housing. It is important that all developments, be they on brownfield or greenfield, are in the right place, in the right scale, with the right infrastructure. In ensuring that this is the case, the Council undertakes an annual Housing Land Audit (HLA).</p> <p>In respect of the HLA programming and the effective housing land supply, it should be noted that an estimate of the timescale for delivery of housing projects has</p>	<p>housing within the Proposed Local Development Plan.</p>
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			<p>been continually difficult due to the downturn in the housing market and drop in housing development nationally. The programming of sites within the audit can only be a reasonable expression of what can be developed within the time periods and there is a significant degree of uncertainty beyond years 2 and 3. It should be noted that as part of the HLA process, local/national developers and land owners with an interest in sites included within the audit have been contacted to obtain their input into the programming process and to identify any relevant constraints. Where this information has been received, it has been incorporated into the audit report.</p> <p>It should be noted that as part of the Proposed Plan process, a review of existing allocations within the adopted LDP was undertaken. As a result, six sites are proposed for de-allocation (one of which will be reallocated as a business use) as part of the Proposed Plan process. It is considered that the undeveloped sites being carried forward, as well as the new allocations are sufficient for the Proposed LDP period.</p> <p>It is noted that a number of sites have been in the audit 10 years or</p>	
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			<p>more. However, completions in the past five years peaked at 373 in 2016, with completions lower in the following two years. The recent low completion rate across the Borders is a result of the economic downturn; many of these sites under construction in the Borders stalled due to lack of developer and mortgage finance, and a number of local builders have ceased trading. Whilst the completion rate rose as part of the 2019 HLA, it should be noted that a large number of those completions were for affordable housing. Overall, the average rate of completions over the previous five years was 292 units (this is considerably lower than pre-recession). This has resulted in a number of sites stalling or being delayed in recent years.</p> <p>It is considered that the Proposed LDP, between new allocations and allocations being carried over from the adopted LDP, does provide a range and choice of sites throughout the Scottish Borders. As discussed above, it is increasingly difficult to programme which sites are likely to come forward, therefore the programming is only a reasonable expression of what can be developed within the time periods.</p>	
Peebles	APEEB044, Rosetta Road	The contributor considers that site APEEB044 Rosetta Road should be removed from the plan.	Comments noted.	It is recommended that the Council

		<p>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. <b>(127 (1 of 3))</b></p>	<p>The site is allocated for housing in the adopted Local Development Plan (LDP) and it is proposed to be carried over into the Proposed LDP, with an indicative site capacity for 100 units.</p> <p>In respect of the HLA programming and the effective housing land supply, it should be noted that an estimate of the timescale for delivery of housing projects has been continually difficult due to the downturn in the housing market and drop in housing development nationally. The programming of sites within the audit can only be a reasonable expression of what can be developed within the time periods and there is a significant degree of uncertainty beyond years 2 and 3. It should be noted that as part of the HLA process, local/national developers and land owners with an interest in sites included within the audit have been contacted to obtain their input into the programming process and to identify any relevant constraints. Where this information has been received, it has been incorporated into the audit report.</p> <p>It is considered that the Proposed LDP, between new allocations and allocations being carried over from the adopted LDP, does provide a</p>	<p>agree to retain site APEEB044 for housing within the Proposed Local Development Plan.</p>
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			<p>range and choice of sites throughout the Scottish Borders. As discussed above, it is increasingly difficult to programme which sites are likely to come forward, therefore the programming is only a reasonable expression of what can be developed within the time periods.</p> <p>In addition, it is noted that it is intended that the Proposed Plan will allocate a new housing site at Land South of Chapelhill Farm (APEEB056). The Roads Planning section have stated: <i>“Any development at the north end of Peebles will be reliant upon improved vehicular linkage being provided over the Eddleston Water between Rosetta Road and the A703. This should ideally be provided between Kingsland Square and Dalatho Street, but there may be other acceptable opportunities further north. Third party land ownership will be an issue. ... Some minor road improvement work may be required to Rosetta Road leading to the site from the town to facilitate the flow of traffic and the existing public road through the site will likely need to be modified to accommodate the development. A Transport Assessment would be required to identify and address transport impacts and to demonstrate sustainable travel is</i></p>	
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			<p><i>achievable”.</i></p> <p>As a result of the above, a site requirement for site (APEEB056) is included within the Proposed Plan stating that the above improved connectivity will be required. This therefore, will allow for developers/landowners of the Rosetta Road sites to work together and enable the sharing of costs in resolving the requirement of improved connectivity. It is therefore considered that perceived issues with viability can be resolved.</p>	
Peebles	MPEEB006, Rosetta Road	<p>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. <b>(127 (1 of 3))</b></p>	<p>Comments noted.</p> <p>The site is allocated for mixed use in the adopted Local Development Plan (LDP) and it is proposed to be carried over into the Proposed LDP, with an indicative site capacity for 30 units.</p> <p>In respect of the HLA programming and the effective housing land supply, it should be noted that an estimate of the timescale for delivery of housing projects has been continually difficult due to the downturn in the housing market and drop in housing development nationally. The programming of sites within the audit can only be a reasonable expression of what can be developed within the time periods and there is a significant</p>	<p>It is recommended that the Council agree to retain site MPEEB006 for mixed use within the Proposed Local Development Plan.</p>

			<p>degree of uncertainty beyond years 2 and 3. It should be noted that as part of the HLA process, local/national developers and land owners with an interest in sites included within the audit have been contacted to obtain their input into the programming process and to identify any relevant constraints. Where this information has been received, it has been incorporated into the audit report.</p> <p>It is considered that the Proposed LDP, between new allocations and allocations being carried over from the adopted LDP, does provide a range and choice of sites throughout the Scottish Borders. As discussed above, it is increasingly difficult to programme which sites are likely to come forward, therefore the programming is only a reasonable expression of what can be developed within the time periods.</p> <p>In addition, it is noted that it is intended that the Proposed Plan will allocate a new housing site at Land South of Chapelhill Farm (APEEB056). The Roads Planning section have stated: "<i>Any development at the north end of Peebles will be reliant upon improved vehicular linkage being provided over the Eddleston Water between Rosetta Road and the</i></p>	
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			<p><i>A703. This should ideally be provided between Kingsland Square and Dalatho Street, but there may be other acceptable opportunities further north. Third party land ownership will be an issue. ... Some minor road improvement work may be required to Rosetta Road leading to the site from the town to facilitate the flow of traffic and the existing public road through the site will likely need to be modified to accommodate the development. A Transport Assessment would be required to identify and address transport impacts and to demonstrate sustainable travel is achievable".</i></p> <p>As a result of the above, a site requirement for site (APEEB056) is included within the Proposed Plan stating that the above improved connectivity will be required. This therefore, will allow for developers/landowners of the Rosetta Road sites to work together and enable the sharing of costs in resolving the requirement of improved connectivity. It is therefore considered that perceived issues with viability can be resolved.</p>	
Peebles	MPEEB007, March Street Mills	The contributor states that site MPEEB007 March Street Mills should be redeveloped for community. <b>(273)</b>	It should be noted that that site MPEEB007 was allocated as a mixed use site within the Supplementary Guidance on Housing with an indicative capacity	It is recommended that the Council agree to retain site MPEEB007 for mixed use within

			<p>of 70 units. Included within the list of site requirements is: “<i>The site must provide a mix of uses including housing, employment, and potentially commercial and community use</i>”.</p> <p>It should be noted that the Council does not allocate sites for community use. Furthermore, if the housing element was removed, that requirement would need to be reallocated elsewhere within the Peebles area.</p>	the Proposed Local Development Plan.
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. <b>(318)</b>	It should be noted that the longer term site SPEEB004 identified within the current Local Development Plan is subject to a site requirement for the provision of a new bridge. The Council accepts that for the longer term sites and for any other potential new sites south of the River Tweed at Peebles, these too would be dependent on a new bridge. The Council has included the requirement for a new bridge within its Capital Plan and have allocated funding towards taking that project forward from 2028. However, it should be noted that further public consultation on that project is required.	It is recommended that the Council agree to retain site SPEEB004 for longer term housing within the Proposed Local Development Plan.
Selkirk	ASELK033, Angles Field	Support the retention of the site in the LDP. Following the allocation of the site through the Housing SG 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.	The site is already allocated for the proposed use within the Adopted Supplementary Guidance on Housing (November 2017). It is the intention of the Council to retain this	It is recommended that the Council agree to retain site ASELK033 for housing within the

		<p>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. <b>(11)</b></p>	<p>allocation within the Local Development Plan 2. However, the Scottish Environment Protection Agency has raised objections to the allocation of Angles Field (ASELK033) on the grounds that this is undeveloped land and that flood risk from the Long Philip Burn cannot be fully prevented. This matter has been discussed with the Council's Flood and Coastal Management Team and the Senior Project Manager of the Selkirk Flood Protection Scheme. As part of the Selkirk Flood Protection Scheme, a final 'as built' model run will be undertaken of the scheme to determine actual risk. This will confirm the actual standard of protection. It is expected that this will be undertaken by the end of June 2020 and thereafter analysed. This information will then be conveyed to the Scottish Environment Protection Agency for their information and further comments. Angles Field remains an existing allocation within the Local Development Plan 2016 (as amended by the Housing Supplementary Guidance 2017) and it is noted that this allocation is subject to further scrutiny by SEPA.</p>	<p>Proposed Local Development Plan. The issues relating to flooding will be pursued further with SEPA and the Council's Flood Risk and Coastal Management Team.</p>
Tweedbank	MTWEE002, Lowood	<p>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</p>	<p>This site was allocated with an indicative capacity of 300 units through the process of the Council's Supplementary Guidance on</p>	<p>It is recommended that the Council agree to retain site MTWEE002 for</p>



		opportunity. <b>(92)</b>	Housing. This was approved by the Scottish Government. The allocation of this site for mixed use development has therefore been accepted and cannot now be questioned.	housing within the Proposed Local Development Plan.
Tweedbank	MTWEE002, Lowood	The large land allocation at Tweedbank is rather an “all eggs in one basket” solution to housing land supply. <b>(24)</b>	This site was allocated with an indicative capacity of 300 units through the process of the Council’s Supplementary Guidance on Housing. This was approved by the Scottish Government. The allocation of this site for mixed use development has therefore been accepted and cannot now be questioned.	It is recommended that the Council agree to retain site MTWEE002 for housing within the Proposed Local Development Plan.
Chesters, Earliston, 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). <b>(155)</b>	<p>Comments are noted. However, there are considered to be valid reasons for the removal of the 4 sites.</p> <p>In respect of BEY1, the land owner has indicated that they support the removal of the allocated sites as they consider that it could be more realistically developed in conjunction with their holiday park. The owner indicated that they have tried for several years to develop the site for housing, actively marketed the site for 8 years, including a fresh market exercise when the original consent was renewed, and no interest was received from the developers to take the site forward.</p> <p>In respect of zRO16, the site is an</p>	It is recommended that the Council agree that the sites should not be included within the Proposed Local Development Plan.

			<p>active working farm. Therefore, it is evident that the site is not effective and given the working operations of the farm there are no immediate plans for the re-development of this site.</p> <p>In respect of RC2B (Roundabout Farm, Chesters), the site was allocated for housing within the Roxburgh Village Plan (1996) up to the Local Development Plan 2016. Over this period, the size of the site has reduced due to piecemeal development. There is also a mature and prominent tree within the site and it is doubtful that the site could accommodate 5 new units. The owner has agreed that the allocation should be removed.</p> <p>In respect of EEA12B (Earlston Glebe, Earlston), the site has been allocated since 1995, soon after this two houses were developed. Since then, development has not taken place and the site's effectiveness was questioned as long ago as 2007 by Scottish Government as part of the previous Local Plan process. The site will become 'white land' and could be developed for housing in the future as infill development, and it may contribute to a windfall development.</p>	
Chesters,	All sites	The contributor states that they do not see the	Comments are noted. However, as	It is recommended

<p>Earlston, Eyemouth and Preston</p>	<p>proposed for de-allocation (RC2B, EEA12B, BEY1 &amp; zRO16)</p>	<p>rationale for removing currently proposed housing allocations from the LDP, especially if this results in significant and inappropriate housing development in other locations. <b>(166)</b></p> <p>The contributor does not understand why the sites are proposed for removal. <b>(185)</b></p> <p>The contributor states that they do not understand why the sites should be removed. <b>(258)</b></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. <b>(201)</b></p>	<p>noted above there are considered to be valid reasons for the removal of the 4 sites.</p> <p>In respect of BEY1, the land owner has indicated that they support the removal of the allocated sites as they consider that it could be more realistically developed in conjunction with their holiday park. The owner indicated that they have tried for several years to develop the site for housing, actively marketed the site for 8 years, including a fresh market exercise when the original consent was renewed, and no interest was received from the developers to take the site forward.</p> <p>In respect of zRO16, the site is an active working farm. Therefore, it is evident that the site is not effective and given the working operations of the farm there are no immediate plans for the re-development of this site.</p> <p>In respect of RC2B (Roundabout Farm, Chesters), the site was allocated for housing within the Roxburgh Village Plan (1996) up to the Local Development Plan 2016. Over this period, the size of the site has reduced due to piecemeal development. There is also a mature and prominent tree within the site and it is doubtful that the</p>	<p>that the Council agree that the sites should not be included within the Proposed Local Development Plan.</p>
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			<p>site could accommodate 5 new units. The owner has agreed that the allocation should be removed.</p> <p>In respect of EEA12B (Earlston Glebe, Earlston), the site has been allocated since 1995, soon after this two houses were developed. Since then, development has not taken place and the site's effectiveness was questioned as long ago as 2007 by Scottish Government as part of the previous Local Plan process. The site will become 'white land' and could be developed for housing in the future as infill development, and it may contribute to a windfall development.</p>	
<p>Chesters, Earlston, Eyemouth and Preston</p>	<p>All sites proposed for de-allocation (RC2B, EEA12B, BEY1 &amp; zRO16)</p>	<p>The contributor states that they <b>agree</b> with the proposed sites to be de-allocated. <b>(10, 95, 119, 127, 171, 181, 190, 192, 197, 206, 230, 235, 250, 259, 263, 285, 289, 290, 296, 311)</b></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> <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. <b>(311)</b></p>	<p>Comments noted.</p>	<p>It is recommended that the Council agree that the sites should not be included within the Proposed Local Development Plan.</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. <b>(312)</b>		
Chesters, Earliston, Eyemouth and Preston	All sites proposed for de-allocation (RC2B, EEA12B, BEY1 & zRO16)	<p>The contributor states that they <b>do not agree</b> with the proposed sites to be de-allocated. <b>(90, 170, 175,194, 216, 241, 268, 283, 292, 207)</b></p> <p>The contributor disagrees and states that by removing existing allocations, this increases the pressure to develop sites in Peebles. <b>(150)</b></p>	<p>Comments are noted. However, as noted above there are considered to be valid reasons for the removal of the 4 sites.</p> <p>In respect of BEY1, the land owner has indicated that they support the removal of the allocated sites as they consider that it could be more realistically developed in conjunction with their holiday park. The owner indicated that they have tried for several years to develop the site for housing, actively marketed the site for 8 years, including a fresh market exercise when the original consent was renewed, and no interest was received from the developers to take the site forward.</p> <p>In respect of zRO16, the site is an active working farm. Therefore, it is evident that the site is not effective and given the working operations of the farm there are no immediate plans for the re-development of this site.</p> <p>In respect of RC2B (Roundabout Farm, Chesters), the site was allocated for housing within the</p>	It is recommended that the Council agree that the sites should not be included within the Proposed Local Development Plan.

			<p>Roxburgh Village Plan (1996) up to the Local Development Plan 2016. Over this period, the size of the site has reduced due to piecemeal development. There is also a mature and prominent tree within the site and it is doubtful that the site could accommodate 5 new units. The owner has agreed that the allocation should be removed.</p> <p>In respect of EEA12B (Earlston Glebe, Earlston), the site has been allocated since 1995, soon after this two houses were developed. Since then, development has not taken place and the site's effectiveness was questioned as long ago as 2007 by Scottish Government as part of the previous Local Plan process. The site will become 'white land' and could be developed for housing in the future as infill development, and it may contribute to a windfall development.</p>	
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. <b>(195)</b>	Comments are noted.	No action required.
Planning for Housing:	General	The contributor states that it is a stupid idea, which is not cost effective, nor possible. <b>(297)</b>	Comments noted.	No action required.

Question 9				
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. <b>(323)</b>	Comments are noted.  Scottish Borders Council will continue to have progress meetings with Scottish Water and inform them which sites they are de-allocating from the Proposed LDP2, in order to ensure their investment plans are up to date.	No action required.
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) <b>(239)</b>	It should be noted that there are a variety of reasons for sites being de-allocated from the Proposed LDP2.  It is noted that the sites (MESH1001 and MESH1002) were included within the MIR as options for mixed use development. However, these sites are ultimately not included within the Proposed Plan for mixed use development.	No action required.
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. <b>(209)</b>	Comments are noted.  It should be noted that there are a number of existing allocations within the adopted LDP which will be carried over into the Proposed LDP2.  However, there are a variety of reasons why these sites have not yet been developed. In recent years the Scottish Borders has experienced the recession, which has resulted in a decrease in completions. SBC are aware of the	No action required.

			current economic position regarding the lack of development finance and the availability of mortgage finance for buyers. It should be noted that in recent years, there are very few local housebuilders developing sites within the Scottish Borders and some have ceased trading. This demonstrates the direct impact upon rural areas, as a result of the current economic climate.	
Planning for Housing: Question 9	General	<p>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.</p> <p>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. <b>(213)</b></p>	<p>Comments are noted.</p> <p>Comments are noted in respect of the existing site requirements. Should any of the sites come forward as part of a planning application, the sites would be subject to consultation at that stage, with a range of internal and external consultees.</p>	No action required.
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. <b>(24)</b>	<p>Comments are noted.</p> <p>There are a number of existing allocations within the adopted LDP which will be carried over into the Proposed LDP2. However, there are a variety of reasons why these sites have not yet been developed. In recent years the Scottish Borders has experienced the recession, which has resulted in a decrease in</p>	No action required.



			<p>completions. SBC are aware of the current economic position regarding the lack of development finance and the availability of mortgage finance for buyers. It should be noted that in recent years, there are very few local housebuilders developing sites within the Scottish Borders and some have ceased trading. This demonstrates the direct impact upon rural areas, as a result of the current economic climate.</p>	
<p>Planning for Housing: Question 9</p>	<p>General</p>	<p>The contributor states that all farmland should be refused for housing. <b>(27)</b></p>	<p>Comments are noted. However, the Council has a duty to ensure that sufficient housing land is provided for and allocated within LDP's, to meet the housing land requirement.</p> <p>Not all of this housing land requirement can be met through the development of brownfield sites. Therefore, there will be a requirement to allocate greenfield sites, in order to ensure that the Council meets the housing land requirement and ensures that there is a 5 year effective housing land supply. In allocating land for housing development consideration must be given to sustaining rural communities by identifying opportunities for housing within countryside locations including farmland where appropriate</p>	<p>No action required.</p>

## 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	Proposed Response to Main Issues Raised	Recommendation
Town Centres: Question 10	Agree with preferred option	The contributor agrees with the preferred option within the Main Issues Report. <b>(24, 27, 151, 153, 171, 181, 206, 215, 216, 222, 230, 243, 259, 262, 273, 274, 276, 277, 283, 290, 292, 296, 312)</b>	Support noted.	The following recommendation is in respect of all representations received to Q10.  It is recommended that Policy ED4 be updated to remove the Core Activity Areas from Hawick and Stow and reduce the Core Activity Area in Galashiels to exclude Channel Street and Douglas Bridge.  To provide flexibility and maintain vitality and viability in the retail core of the town centre, Core Activity Areas have been identified in Duns, Eyemouth, Galashiels, Jedburgh, Kelso Melrose, Peebles
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. <b>(195)</b>	Comments noted.	
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. <b>(196)</b>	Support noted. Additional flexibility has also been incorporated into Policy ED4.	
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. <b>(197)</b>	Comments noted, although the Core Activity Areas for Stow and Hawick have been removed and the Galashiels Area has been reduced in size.	
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. <b>(200)</b>	Comments noted.	
Town Centres:	Agree with	The contributor broadly agrees with the preferred	Comments noted, sports and leisure	

Question 10	preferred option	options for Core Activity Areas and would like to see this expanded to include sports and leisure uses more generally. <b>(239)</b>	uses are generally supported within all town centres although there is a more stringent test for such uses within Core Activity Areas.	and Selkirk.  Use classes 1, 2 and 3 are seen as appropriate uses within these Core Activity Areas
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. <b>(273)</b>	Comments noted, although the Core Activity Areas for Stow and Hawick have been removed and the Galashiels Area has been reduced in size.	However, changes from class 1 to Class 2 uses in Kelso, Melrose and Peebles will only be allowed in exceptional circumstances where a proposal makes a significant positive contribution to the core retail function and satisfactory marketing information is submitted in relation to premises which have been vacant for a minimum of six months.
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. <b>(277)</b>	Comments noted, although a case must be made for class 10 and 11 uses in Core Activity Areas taking account of matters such as the performance of the town centre.	
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. <b>(289)</b>	Comments noted.	
Town Centres: Question 10	Agree with preferred option	The contributor states that Core Activity Areas should be retained and not reduced in size. <b>(290)</b>	Comments noted, although the Core Activity Areas for Stow and Hawick have been removed and the Galashiels Area has been reduced in size.	
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. <b>(153)</b>	Hawick's Core Activity Area has been removed and Galashiels reduced	
Town Centres: Question 10	Agree with alternative option 2	The contributor thinks the existing Core Activity Areas should be removed altogether. <b>(95)</b>	It is considered that Core Activity Areas still have a role to play in sustaining town centre performance. Whilst the amending policy has allowed a wider range of uses the complete removal of Core Activity Area across the Scottish Borders would likely have a detrimental impact on the performance of these town centres with regards to, for example, decreased footfall levels	Community and cultural facilities could be supported in exceptional circumstances. Residential

			and higher vacancy rates.	
Town Centres: Question 10	Disagree with preferred option	The contributor does not agree with the preferred option within the Main Issues Report. <b>(184)</b>	Comments noted.	development on the ground floor of Core Activity Areas will generally be resisted and could only be supported in exceptional circumstances taking account matters such as town centre performance and the need for a more flexibility of uses, economic likelihood of premises being retained as a commercial use and opportunities to gain access to upper floors.  In order to encourage interest, vibrancy and vitality to the Core Activity Area, applications must demonstrate the provision of active frontages.
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. <b>(24)</b>	Policy ED4 has been updated to provide additional flexibility within some Core Activity Areas. This will allow a wider range of uses in some Core Activity Areas to help encourage vitality and vibrancy within town centres. The Core Activity Area only relates to ground floor premises and policy is supportive of a range of uses on the upper floors.	
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. <b>(192)</b>	It was agreed that Policy ED4 be updated to remove the Core Activity Area from Hawick.	
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. <b>(215)</b>	Comments noted, although a case must be made for class 10 and 11 uses in Core Activity Areas taking account of matters such as the performance of the town centre.	
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	Comments noted.  Additional flexibility has been incorporated into Policy ED4 following the Town Centre Core Activity Area Pilot Study. This will allow a wider range of uses within some of the Core Activity Areas.	

		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 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. <b>(318)</b>	It should be noted that business rates are not within the remit of the Local Development Plan.	
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. <b>(318)</b>	Comments noted.	
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. <b>(243)</b>	Additional flexibility has been incorporated into Policy ED4 following the Town Centre Core Activity Area Pilot Study. This will allow a wider range of uses within some of the Core Activity Areas.	
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	Comments noted. It is acknowledged that each town centre has a different role and town	

		<p>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. <b>(236)</b></p>	<p>centre performance varies greatly throughout the Scottish Borders.</p> <p>It should be noted that a reference to the potential of residential uses in town centres and Core Activity Areas is made within Policies ED3 and ED4. In essence residential conversions are acceptable on upper floors although a more stringent test is applied on ground floor.</p>	
Town Centres: Question 10	General	<p>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. <b>(315)</b></p>	<p>Comments noted.</p> <p>The Council monitors town centre vacancy rates biannually and footfall annually and the Core Activity Area in Galashiels has been reduced in size.</p>	
Town Centres: Question 10	General	<p>The contributor states that much more flexibility should be allowed for different uses. <b>(274)</b></p>	<p>Comments noted.</p>	
Town Centres: Question 10	General	<p>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.</p>	<p>It should be noted that a reference to the potential of residential uses in town centres and Core Activity Areas is made within Policy ED4. In essence residential conversions are acceptable on upper floors although a more stringent test is applied on ground floor.</p> <p>Policy ED4: Core Activity Areas in Town Centres has also been updated to allow greater flexibility and a wider range of uses within Core Activity Areas.</p>	

		But it is a long term game. The contributor does not believe you can simply 'encourage and protect' as laid out in the LDP. <b>(295)</b>		
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. <b>(137)</b>	Policy ED4: Core Activity Areas in Town Centres has also been updated to allow greater flexibility and a wider range of uses within Core Activity Areas.  The Local Development Plan does not have remit with regards to parking controls.	
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. <b>(25)</b>	Comments noted. It should be noted that the setting of business rates does not fall within the remit of the Local Development Plan.	
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. <b>(190)</b>	Comments noted. It should be noted that the setting of business rates does not fall within the remit of the Local Development Plan.	
Town Centres: Question 10	General	The contributor states that there is a need to be flexible and take case by case decisions. <b>(151)</b>	Comments noted.	
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	Comments noted.	



		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. <b>(256)</b>		
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. <b>(258)</b>	Comments noted.	
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. <b>(260)</b>	Comments noted. Vacancy rates and footfall within town centres are regularly monitored by the Council. However, business rates are not within the remit of the Local Development Plan.	
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. <b>(264)</b>	Additional flexibility has been incorporated into Policy ED4 for some Core Activity Areas.	
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. <b>(283)</b>	Comments noted. Both undertakers and charity shops are Class 1 retail uses and therefore are seen as suitable uses within Core Activity Areas.	
Town Centres: Question 10	General	The contributor states there are a number of historic examples of businesses locating in an area to take 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	The Core Activity Area only relates to ground floor premises and policy is supportive of a range of uses on the upper floors.  The Council would be unlikely to have finance available to purchase	

		<p>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. <b>(289)</b></p>	<p>properties as suggested.</p>	
<p>Town Centres: Question 10</p>	<p>General</p>	<p>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. <b>(73)</b></p>	<p>Comments noted. Community Councils are invited to be involved in each stage of the Local Development Plan process. This includes workshops where Community Councils are offered the opportunity to input ideas and proposals for their area and where appropriate these are taken forward and incorporated into the Plan.</p>	
<p>Town Centres: Question 10</p>	<p>General</p>	<p>The contributor is pleased that the Council is considering non-retail businesses in town centres. The 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</p>	<p>Policy ED4 allows a more flexible range of uses and consideration is given to the longevity of the vacancy of premises within the decision making process.</p>	

		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. <b>(1)</b>	
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 and 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. <b>(1)</b>	Public convenience facilities falls out of the remit of planning control.
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. <b>(318)</b>	Comments noted.
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 <sup>st</sup> Century. <b>(22)</b>	Policy ED4 is being substantially altered to address town centre performance issues and more flexibility to allow a wider range of uses has been incorporated into it.
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	Comments noted. Policies ED3 and ED4 acknowledge that the role of town centres is changing. Policy ED4 has also been updated to

		<p>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. <b>(7)</b></p>	<p>reduce the Core Activity Area of Galashiels with the removal of Channel Street and Douglas Bridge. This will also allow more flexibility and a wider range of uses in these areas.</p> <p>The settlement profile for Galashiels also acknowledges that the new Great Tapestry of Scotland building in Channel Street is currently under construction and is expected to be open in Spring 2021. It is hoped that this will be a key catalyst in regenerating the town centre.</p>	
Town Centres: Question 10	Galashiels	<p>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. <b>(7)</b></p>	<p>Comments noted.</p>	
Town Centres: Question 10	Galashiels	<p>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</p>	<p>Policy ED4 has been amended to reduce the Core Activity Area in Galashiels. It is proposed that Channel Street and Douglas Bridge are no longer included within the Core Activity Area for Galashiels. This will allow more flexibility and a wider range of uses in these areas. These changes will continue to be monitored and reviewed as part of the Local Development Plan process.</p>	

		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. <b>(7)</b>		
Town Centres: Question 10	Galashiels	<p>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’.</p> <p><b>(22)</b></p> <p>Following a Retail Gap Analysis study, SBC Economic Development undertook a survey of UK national 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. <b>(22)</b></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</p>	<p>Comments noted. Policy ED4 be updated to remove the Core Activity Area for Hawick and reduce the Core Activity Area in Galashiels. It is proposed that Channel Street and Douglas Bridge are no longer included within the Core Activity Area for Galashiels. This will allow more flexibility and a wider range of uses in these areas. These changes will continue to be monitored and reviewed as part of the Local Development Plan process. Class 2 uses will now be allowed within the Core Activity Area in Galashiels. The Core Activity Area only relates to ground floor premises and policy is supportive of a range of uses on the upper floors. Channel Street in particular has a number of vacant units within it, many of which have a large floorspace and will be difficult to attract business uses. As Channel Street is being removed from the Core Activity Area Policy ED3 will be relevant and can support residential development within it if a sufficient case is submitted.</p> <p>It should also be noted that Policy ED3: Town Centres and Shopping Development recognises the</p>	

		<p>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"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> <li>• 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. <b>(22)</b></li> </ul>	<p>changing role of town centres and acknowledges that they are community and service centres as well as retail locations. Policy ED3 is supportive of a very wide range of uses within the town centre.</p> <p>The Galashiels Masterplan contains a number of potential future land use developments and these will be developed further by the Council.</p>	
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		<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"><li>• Fewer banks/ building societies, certainly smaller banks, possibly a 'Banking Hall' which hosts multiple brands.</li><li>• No newsagents – as printed paper costs increase per unit with falling physical circulation</li><li>• 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.</li><li>• Libraries – are likely to become too costly to maintain in their current format</li><li>• Churches are likely to continue to have to merge with falling congregations.</li><li>• 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.</li><li>• 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.</li><li>• 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</li></ul>		
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		<p>pay galleries to display their products, rather than the present model of retailers purchasing products. <b>(22)</b></p> <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 1000'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! <b>(22)</b></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. <b>(22)</b></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. <b>(22)</b></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</p>		
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		<p>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! <b>(22)</b></p> <p>The town centre will have to transform to become the niche retail (not core retail)/ leisure/ social/ food &amp; 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. <b>(22)</b></p>		
Town Centres: Question 10	Galashiels	<p>The contributor states that the Council should be proactive at developing the site in its possession in 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. <b>(23)</b></p>	Comments noted.	
Town Centres: Question 10	Galashiels	<p>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. <b>(29)</b></p>	<p>At present there are parking areas at for example: Currie Road, High Street behind Iceland, Galashiels Interchange area. There is also substantial parking at Asda and Tesco which can be used for joint shopping trips in conjunction with these supermarkets. Town centre parking in Galashiels requires to continue to be monitored by the Council. Funding is a challenge for the development/CPO of existing buildings and land.</p>	
Town Centres:	Galashiels	The town of Galashiels is in desperate need of	Policy ED4 has been updated to	

Question 10		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. <b>(43)</b>	reduce the Core Activity Area in Galashiels.  Additional flexibility has been incorporated into Policy ED4. This will allow a wider range of uses along Channel Street and Douglas Bridge. Currently the Great Tapestry of Scotland Building is under construction which will play a key role in regenerating the town centre of Galashiels.	
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"> <li>• to establish improved parking management to help facilitate a better flow of traffic and improved pedestrian safety in the centre of town</li> <li>• 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. <b>(305)</b></li> </ul>	Selkirk will retain its current Core Activity Area with a more flexible range of uses being allowed. However giving the vacancy rates within the town it is not considered it can be justified to extend the Core Activity further.  The Council will continue to monitor parking within the town and traffic speed control is out with the remit of the LDP	
Town Centres: Question 10	Kelso	The contributor states that the Core Activity Area within Kelso should be retained and protected. <b>(288)</b>	Comments noted. The Core Activity Area for Kelso will be retained and included within the Proposed Local	

			Development Plan.	
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. <b>(82)</b>	Comments noted. The Core Activity Area for Melrose will be retained and included within the Proposed Local Development Plan. The Council will continue promote tourism.	
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. <b>(272)</b>	Comments noted.	
Town Centres: Question 10	Peebles	<p>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. <b>(240)</b></p> <p>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. <b>(318)</b></p> <p>The contributor states the Council should be prepared to reduce the size of Core Areas and</p>	Comments noted. Peebles is performing well in comparison to other town centres in the Scottish Borders both in terms of retail vacancy rates and footfall. This will continue to be monitored as part of the Scottish Borders Council Town Centre Survey. Therefore it is considered that no major changes are needed in relation to the Peebles Core Activity Area.	

		allow a wider range of uses so long as they are not unsightly and generate footfall. Peebles Core Area size looks OK at present. <b>(96)</b>		
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## QUESTION 11

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

## QUESTION 11

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	Proposed Response to Main Issues Raised	Recommendation
Town Centres: Question 11	Duns or Greenlaw	The contributor agrees with the requirement for a supermarket and suggests Duns or Greenlaw as a location. <b>(230)</b>	The comments are noted. However, no specific site options were put forward for Central Berwickshire for consideration. The LDP makes reference within the Duns settlement profile that Duns is the preferred area of search although no specific site has been able to be identified.	No action required.
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. <b>(215)</b>		
Town Centres: Question 11	General	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?  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. <b>(289)</b>		
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. <b>(297)</b>		
Town Centres: Question 11	General	SEPA advise that they have no comments. <b>(119)</b>		

## 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	Proposed Response to Main Issues Raised	Recommendation
Town Centres: Question 12	Disagree	The contributor states that developer contributions should never be removed. It is too much of a soft option 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. <b>(23)</b>	There were a range of comments received in respect of developer contributions within town centre core activity areas. The following relates to all matters raised.	No action required. The Council will continue to monitor regional Developer Contributions and update the SPG on Development Contributions when required.
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. <b>(95, 171,178,179,181,184, 187, 222, 231, 240, 251, 258, 270, 276, 291, 292)</b>	Policy IS2: Developer Contributions, contained within the Proposed LDP aims to provide guidance on how the Council intends to comply with the provisions of Circular 3/2012 on the use of Section 75 Planning Agreements. The Supplementary Planning Guidance on Development Contributions also provides guidance regarding the developer contributions sought.	
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. <b>(175)</b>		
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. <b>(223)</b>	There is currently a Town Centre Pilot Study, which provides further guidance for Galashiels and Hawick. This	
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. <b>(200)</b>		



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. <b>(250)</b>	<p>includes a relaxation on developer contributions being sought within these towns. The Pilot Study will take effect until the LDP2 is adopted.</p> <p>It should be noted that the Supplementary Planning Guidance on Development Contributions will be reviewed periodically to reflect the ongoing needs and priorities of the Council and will expand upon the development contributions sought. The appropriateness of the development contributions to proposals will be considered through the planning application process.</p> <p>The Council has produced an SPG on Development Contributions and will continue to update it accordingly periodically when required.</p>
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. <b>(273)</b>	
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. <b>(274)</b>	
Town Centres: Question 12	Disagree	The contributor states that developer contributions are an essential component. <b>(290)</b>	
Town Centres: Question 12	Disagree	The contributor feels that the core activity areas should be retained and that developer contributions should also be maintained. <b>(289)</b>	
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. <b>(305)</b>	
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. <b>(217)</b>		
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. <b>(318)</b>		
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. <b>(229)</b>		
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. <b>(209)</b>		
Town Centres: Question 12	Agree	The contributor supports the removal of developer contributions for change of uses between appropriate town centre uses. <b>(24)</b>  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. <b>(90)</b>		

		<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. <b>(93)</b></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. <b>(27, 190,196, 206, 230, 259, 296)</b></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. <b>(196)</b></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. <b>(195)</b>		
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. <b>(283)</b>		
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. <b>(236)</b>		

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. <b>(264)</b>		
Town Centres: Question 12	Agree	The contributor agrees that developer contributions should be removed or reduced to encourage development in the town centre. <b>(288)</b>		
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. <b>(215)</b>		
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. <b>(151)</b>		
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. <b>(197)</b>		
Town Centres: Question 12	General	The contributor states that developer contributions should be judged on a case for case basis for large scale new development or redevelopment. <b>(24)</b>		
Town Centres: Question 12	General	The contributor supports the proposal, but only where the development concerned does no 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. <b>(152)</b>		
Town Centres: Question 12	General	The contributor states that we should be encouraging development and not overly taxing it (ie) rail contributions. <b>(168)</b>		
Town Centres: Question 12	General	The contributor states that development contributions should only be removed under extreme conditions. <b>(256)</b>		
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. <b>(277)</b>		
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. <b>(282)</b>		

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. <b>(312)</b>		
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. <b>(315)</b>		
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. <b>(239)</b>		
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. <b>(216)</b>		
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 these facilities. This is required before any further house building takes place. The same should be for doctors surgeries. <b>(147)</b>		
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. <b>(1)</b>		
Town Centres: Question 12	General	SEPA advise that they have no comments. <b>(119)</b>		
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. <b>(147)</b>		
Town Centres: Question 12	General	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>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). <b>(294)</b></p>		
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## 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	Proposed Response to Main Issues Raised	Recommendation
Delivering sustainability and climate change agenda: Question 13	Support preferred option	Support the preferred option as proposed. <b>(145, 171, 199, 215, 230, 250, 253, 262, 263, 273, 274, 276, 277, 290, 296, 312, 315, 195)</b>	Support noted.	No action required.
		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. <b>(101)</b>	Comments noted.	No action required.
		We agree with the preferred option and consider that 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. <b>(119)</b>	Comments noted.	No action required.
		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	Comments noted.	No action required.

		<p>be preferred over carbon-based heating. Policies must be developed in order to achieve these ends. <b>(153)</b></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 adaptation. <b>(165)</b></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 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. <b>(213)</b></p> <p>Network Rail fully supports the measures put forward by the Council in regard to sustainability.</p>	<p>Support noted.</p> <p>Comments noted.</p> <p>Support noted.</p>	<p>No action required.</p> <p>No action required.</p> <p>No action required.</p>
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		<p>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. <b>(294)</b></p> <p>Scottish Water broadly welcomes the Council's continued support for sustainability and climate change adaptation. We firmly support the preferred option to continue with the policies and proposals outlined in the LDP. <b>(323)</b></p>	Support noted.	No action required.
Delivering sustainability and climate change agenda: Question 13	Support preferred option with further considerations	<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. <b>(90)</b></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. <b>(169)</b></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</p>	<p>Comments noted. It is not always possible to allocate sites solely within larger settlements due to matters such as infrastructure constraints. It should be noted the LDP proposes only a business site at Eshiels.</p> <p>Concerns regarding potential turbines over 200m in height is a concern for many bodies. Within the Scottish Borders it is considered appropriate landscape capacity studies have been carried out to help guide such applications.</p> <p>Comments noted. It is not always possible to allocate sites solely within larger settlements due to</p>	<p>No action required.</p> <p>No action required.</p> <p>No action required.</p>

		<p>most will commute to Edinburgh for work. This means passing through Peebles en-route, more cars on heavily used roads. More car miles. <b>(207)</b></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. <b>(272)</b></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 plus majority will commute to Edinburgh. More cycle paths Electric points for vehicles. Solar panels. <b>(292)</b></p>	<p>matters such as infrastructure constraints. It should be noted the LDP proposes only a business site at Eshiels.</p> <p>The Council will continue to promote district heating although in some instances the generally smaller scale developments make these unviable. Whilst being aware of the issues of fuel poverty the LDP cannot lay down policies to prevent or control this</p> <p>Comments noted. It is not always possible to allocate sites solely within larger settlements due to matters such as infrastructure constraints. It should be noted the LDP proposes only a business site at Eshiels. The LDP promotes the use of cycle paths and solar panels and a proposed Supplementary Planning Guidance on Sustainability and Climate Change will give further advice on matters such as the requirements within new developments for electric charging points for vehicles. Appendix 3 of the LDP confirms the requirement for electric vehicle charging points for new developments. It is intended that the Council will produce Supplementary Planning Guidance through the period of the LDP to develop and establish requirements for sustainable transport. The SPG</p>	<p>No action required.</p> <p>No action required.</p>
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			is likely to cover a range of subjects taking on board the findings of the Council's `Sustainable Development Committee`.	
Delivering sustainability and climate change agenda: Question 13	Other comments	As these become increasingly prevalent, more charging points will be essential. <b>(22)</b>	A proposed Supplementary Planning Guidance on Sustainability and Climate Change will give further advice on matters such as the requirements within new developments for electric charging points for vehicles. Appendix 3 of the LDP confirms the requirement for electric vehicle charging points for new developments. It is intended that the Council will produce Supplementary Planning Guidance through the period of the LDP to develop and establish requirements for sustainable transport. The SPG is likely to cover a range of subjects taking on board the findings of the Council's `Sustainable Development Committee`.	No action required.
		Development in the countryside with street lighting and additional car commuters have an adverse effect on climate change. <b>(23)</b>	Comments noted, although it must be acknowledged that in some cases there are benefits of supporting development in the countryside.	No action required.
		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. <b>(24)</b>	Comments noted.	No action required.

		<p>Use of cars should be discouraged through access to good bus and train services. <b>(25)</b></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. <b>(45)</b></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. <b>(96)</b></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. <b>(99)</b></p>	<p>Comments noted. The LDP promotes the use of public transport.</p> <p>Comments noted. The LDP promotes the use of public transport.</p> <p>Comments noted.</p> <p>It is considered the role of Landscape Capacity Studies are clearly confirmed and acknowledged as a very useful starting point for the consideration of planning applications for wind turbines. Their role must not be underplayed.</p>	<p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p>
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		<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). <b>(137)</b></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. <b>(144)</b></p> <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. <b>(155)</b></p>	<p>The Council is supportive of a wide range of renewable energy types and encourages these where possible. However, it is appreciated that in some instances some renewable energy schemes are financially not feasible nor practical. Certainly the Council incorporates these within their own schemes where possible.</p> <p>The LDP must continue to address climate change and make necessary provisions and policies where possible. The Council has recently set up a Sustainable Development Committee which seeks to develop a corporate approach to addressing climate change issues. This will feed into the LDP process.</p> <p>The LDP does encourage and promote solar panels, cycle routes, public transport, renewable energy and the Council promotes and encourages vehicle charging points.</p>	<p>No action required.</p> <p>No action required.</p> <p>No action required.</p>
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		<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. <b>(172)</b></p>	<p>Appendix 3 of the LDP confirms the requirement for electric vehicle charging points for new developments. It is intended that the Council will produce Supplementary Planning Guidance through the period of the LDP to develop and establish requirements for sustainable transport. The SPG is likely to cover a range of subjects taking on board the findings of the Council's 'Sustainable Development Committee'.</p> <p>Comments noted. Whilst there is a desire to allocate land within major settlements there is still a duty to consider development in other areas of the Region. Eshiels is in close proximity to Peebles, although the Proposed LDP does not include any residential development within the vicinity of Eshiels. The LDP promotes solar panels, cycle paths and good public transport, and the Council supports the provision of vehicle charging points. Appendix 3 of the LDP confirms the requirement for electric vehicle charging points for new developments. It is intended that the Council will produce Supplementary Planning Guidance through the period of the LDP to develop and establish requirements for sustainable transport. The SPG is likely to cover a range of subjects taking on board the findings of the</p>	<p>No action required.</p>
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		<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 land use 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</p>	<p>Council’s `Sustainable Development Committee`.</p> <p>The LDP makes reference to the Land Use Strategy and its role in giving guidance to the planning process, e.g. introductory text to Policy EP3, although it must be acknowledged that it remains a pilot study and not a formally adopted document. All sites considered for inclusion in the LDP are tested in terms of potential flood risk. The Scottish Borders Woodland Strategy confirms the need for the promotion of a range of tree planting including native species.</p>	<p>No action required.</p>
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		<p>flood prevention defences/structures, should not alter this approach. <b>(182)</b></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. <b>(185)</b></p> <p>SBC could be more proactive. <b>(186)</b></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 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</p>	<p>Comments noted. The Council will continue to promote and investigate means of developing these matters.</p> <p>Comments noted, though it is unclear how the respondent suggests this could be done.</p> <p>The LDP must follow national planning guidance and cannot reasonably require development stipulations which are outwith the scope of planning control. The LDP makes reference to the use of the Land Use Strategy although it must be noted that whilst it gives useful advice it is a pilot study and not a formally adopted document. The Council's Supplementary Guidance on Renewable Energy is pro-active in encouraging a wide range of renewable energy typologies within appropriate locations. The Scottish Borders Woodland Strategy confirms the need for the promotion of a range of tree planting and the Council is currently taking part in a Regional Strategic Woodland Creation pilot project. This project aims to develop a new approach to forestry which seeks better</p>	<p>The Council will continue to promote and investigate means of developing these matters.</p> <p>No action required.</p> <p>No action required.</p>
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		<p>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 (e.g. peatland regeneration, flood mitigation, enhanced landscapes, biodiversity, carbon sequestration and better access). <b>(196)</b></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. <b>(197)</b></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</p>	<p>integration of new woodland with farming and other land uses to maximise the benefits.</p> <p>The LDP has a specific chapter on addressing climate change which is carried forward and embedded into policies throughout including ED9 – Renewable Energy Developments.</p> <p>Comments noted. It is considered the LDP addresses and lays down policy criteria tests where possible to ensure low carbon construction e.g. policy PMD2. Building Standards have sustainable construction standards which must be complied with as part of the building warrant process. The Council's newly formed Sustainable Development Committee will develop a corporate approach for addressing the climate change agenda. This will feed into the LDP</p>	<p>No action required.</p> <p>No action required.</p>
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		<p>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 e.g. will developments have recharging points for electric cars, ground source heat pumps - never mind solar panels e.g. as standard . Mentioning them but not insisting on them will mean they won't happen. <b>(197)</b></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. <b>(201)</b></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. <b>(203)</b></p>	<p>process including the production of Supplementary Planning Guidance on Sustainability and Climate Change. Appendix 3 of the LDP confirms the requirement for electric vehicle charging points for new developments. It is intended that the Council will produce Supplementary Planning Guidance through the period of the LDP to develop and establish requirements for sustainable transport. The SPG is likely to cover a range of subjects taking on board the findings of the Council's 'Sustainable Development Committee'.</p> <p>Finding sufficient housing land in Peebles is a challenge thus the search area at the Main Issues Report stage looked further afield. No residential sites are allocated in Eshiels within the Proposed LDP.</p> <p>The Council supports the promotion of electric vehicle charging points and it is envisaged the Supplementary Planning Guidance on Sustainability and Climate Change can investigate this matter further and lay down guidance for new development. Appendix 3 of the LDP confirms the requirement for electric vehicle charging points for new developments. It is intended that the Council will produce Supplementary Planning Guidance</p>	<p>No action required.</p> <p>The proposed SPG on Sustainability and Climate Change can investigate electrical charging point requirements further and lay down guidance for new development.</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. <b>(236)</b></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</p>	<p>through the period of the LDP to develop and establish requirements for sustainable transport. The SPG is likely to cover a range of subjects taking on board the findings of the Council’s ‘Sustainable Development Committee’. The Council’s Supplementary Guidance on Renewable Energy promotes a wide range of typology types.</p> <p>Comments noted.</p> <p>Comments noted. The Council has recently set up a Sustainable Development Committee which will further develop a corporate approach to address some of the issues referenced. It should be noted works relating to Peebles Changeworks are largely retro fitting and are works which are outwith planning control.</p>	<p>No action required.</p> <p>No action required.</p>
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		<p>scheme? <b>(214)</b></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. <b>(216)</b></p> <p>Wind energy is the future combined with small scale hydro schemes. <b>(222)</b></p> <p>The SBC recycling policy is woefully inadequate as most plastics are single use. This requires joined up work with manufacturers. <b>(223)</b></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. <b>(229)</b></p> <p>The Ironside Farrar Landscape Capacity and Cumulative Impact Study 2016 gives much-</p>	<p>Comments noted. The LDP does encourage and promote solar panels, cycle routes, public transport, renewable energy and the Council promotes and encourages vehicle charging points. Appendix 3 of the LDP confirms the requirement for electric vehicle charging points for new developments. It is intended that the Council will produce Supplementary Planning Guidance through the period of the LDP to develop and establish requirements for sustainable transport. The SPG is likely to cover a range of subjects taking on board the findings of the Council's 'Sustainable Development Committee'.</p> <p>Comments noted.</p> <p>Comments noted. The LDP is not the vehicle for laying down definitive guidance on how recycling must be carried out.</p> <p>The LDP continues to promote solar panels on roofs, cycle paths and a good public transport system.</p> <p>Comments noted. Decision making on planning applications on wind</p>	<p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p>
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		<p>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 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. <b>(234)</b></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. <b>(239)</b></p> <p>Proposals (in Peebles area) will result in significantly more car /commuter traffic. More</p>	<p>farms is a balance between supporting renewable energy proposals and considering any perceived adverse impacts on the landscape and residencies.</p> <p>It is considered the LDP gives the correct reference and balance to all material considerations for the judgement of planning applications.</p> <p>Development anywhere will have some kind of increase in traffic</p>	<p>No action required.</p> <p>No further action The proposed SPG</p>
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		<p>electric car points. More cycle paths through the town and surrounding area. <b>(241)</b></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"> <li>• 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.)</li> <li>• An assessment of the success of the Key Actions in the 2005 strategy</li> <li>• A reassessment of the economic, environmental and social priorities in forestry and woodlands</li> <li>• A new set of Key Actions. <b>(242)</b></li> </ul> <p>Support and popularise initiatives such as the recently established PHS eco group- it encourages climate change awareness in children</p>	<p>movements. Consideration is given to this via consultations on proposals to the Council's Roads sections. The Council promotes cycle paths provision, vehicle charging points and will develop this further. Appendix 3 of the LDP confirms the requirement for electric vehicle charging points for new developments. It is intended that the Council will produce Supplementary Planning Guidance through the period of the LDP to develop and establish requirements for sustainable transport. The SPG is likely to cover a range of subjects taking on board the findings of the Council's 'Sustainable Development Committee'.</p> <p>There are a number of SPGs/ planning briefs which the Department would wish to update or produce. However, due to staff cutbacks and competing workloads it is impossible to prepare all of these. There are no immediate plans to refresh the woodland strategy at this point in time but these comments are noted and hopefully an update can be carried out in due course in discussion with relevant parties.</p> <p>Comments noted though the LDP is not a vehicle for establishing means nor policies to address this. The</p>	<p>on Sustainability and Climate Change can investigate electrical charging point requirements further and lay down guidance for new development.</p> <p>No immediate action.</p> <p>No action required.</p>
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		<p>and is something they will then keep with them in their adult life. <b>(249)</b></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. <b>(252)</b></p> <p>I feel that any new housing developments should be future-proofed for the environment e.g. all new houses should have solar PV panels etc. <b>(255)</b></p> <p>We should have more solar power, ground source heat, biomass provided closer to the end user e.g. solar farms. <b>(256)</b></p> <p>Encouragement and support for individual/corporate measures to ameliorate building heat loss and encourage heat-preserving measures are important. <b>(258)</b></p> <p>There is nothing unique on offer here that couldn't be achieved without a national park. <b>(260)</b></p>	<p>LDP does encourage public engagement from a range of bodies including young people.</p> <p>Whilst seeking opportunities to develop along the railway corridors that does not mean any other growth areas within the Region should be ignored.</p> <p>Whilst the promotion of the domestic energy types will continue, this does not mean if a householder does not wish to fit solar panels on the roof the application will be refused.</p> <p>The LDP will continue to promote a range of renewable energy types. The Supplementary Guidance on Renewable Energy 2018 confirms support and promotes a wide range of renewable energy techniques giving practical examples.</p> <p>The LDP will continue to promote a range of renewable energy types e.g. policy PMD2 and Supplementary Guidance on Renewable Energy 2018. Low carbon construction forms part of Building Warrant approvals.</p> <p>The subject of a national park within the Scottish Borders requires further debate by the Council.</p>	<p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>The subject of a National Park within the Scottish</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. <b>(264)</b></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. <b>(283)</b></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</p>	<p>It is considered throughout the LDP sustainability is adequately identified with policy references as to how it can be achieved.</p> <p>The Council will continue to request development contributions where required and reasonable.</p> <p>Comments noted. The Council promotes these points when consulted upon the likes of new proposed planting schemes. The Scottish Borders Woodland Strategy confirms the need for the promotion of a range of tree planting and the Council is currently taking part in a Regional Strategic Woodland Creation pilot project. This project aims to develop a new approach to forestry which seeks better integration of new woodland with farming and other land uses to maximise the benefits.</p>	<p>Borders requires further debate by the Council.</p> <p>No action required.</p> <p>The Council will continue to request development contributions where required and reasonable.</p> <p>No action required.</p>
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		<p>sustainability goals. <b>(287)</b></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. <b>(288)</b></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 can't 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. <b>(289)</b></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,</p>	<p>Comments noted.</p> <p>Policy IS10 relates to Waste Management Facilities and lays down a background and a policy test regarding planning related matters. It is considered this is adequate to cover the planning legislative requirements. The LDP is not a vehicle for setting out detailed rules and provision for recycling matters covered by other legislation.</p> <p>It is considered the word appropriate is correct. It is not considered this word suggests a bias in any way. Applications will continue to be judged on a case by case basis with a fair balance being given to all material planning considerations. It is considered LDP policy on Renewable Energy and the Ironside</p>	<p>No action required.</p> <p>No action required.</p> <p>No action required.</p>
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		<p>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. 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. <b>(152, 218)</b></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</p>	<p>Farrar study are useful and fair starting points to help guide planning applications for wind turbines.</p> <p>The Council must seek a balance between supporting renewable energy targets and giving protection to the landscape and environment.</p>	<p>No further action.</p>
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		<p>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. <b>(218)</b></p>	<p>It is considered the LDP Renewable Energy policy ED9 and the Ironside Farrar Landscape capacity study are useful starting points to judge these matters when planning applications for turbines are submitted. It is considered that the aforementioned, along with the Supplementary Guidance on Renewable Energy, give the correct balance required.</p>	
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		<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 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 regime, 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</p>	<p>Comments noted. It must be acknowledged that whilst the Council has a duty to protect the landscape and environment the Scottish Govt has made it very clear that all local authorities must support wind farms where appropriate. This cannot be ignored when seeking this balance whilst processing planning applications for larger turbines. It is considered that in some parts of the Scottish Borders some larger scale proposals could be supported as identified in the Ironside Farrar Landscape Capacity Study 2016. However, it is fully appreciated the impacts higher turbines can have and therefore such proposals must be very carefully scrutinised. The Council is aware of a project to designate a considerably large part of the region, as a dark skies area. Once this is confirmed the Council will produce a Supplementary Guidance on this subject to confirm what this means in practice regarding planning policy and the determination of planning applications relating to lighting within these areas. The Council is not in a position to confirm the full implications of this as yet and already is aware of mixed messages as to whether lights on wind turbines can or cannot be installed in these designations. Clearly much more</p>	<p>If the dark skies area is designated the Council will produce a Supplementary Planning Guidance confirming the designated area and a planning policy for dealing with planning applications within the designation which proposes lighting.</p>
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		<p>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) communications 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. <b>(160)</b></p> <p>No more wind farms please. They are an eyesore. <b>(240)</b></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</p>	<p>work and clarity requires to be investigated regarding this matter.</p> <p>Comments noted</p> <p>Comments noted. The full implications and understanding of this, costs involved etc. will require detailed investigation.</p>	<p>No action required.</p> <p>No immediate action required.</p>
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		<p>offset cost of flood prevention. The council should promote a connection between the two. <b>(291)</b></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 manner. Scottish Borders Council must ensure that any proposals are weighed with local community views considered. <b>(299)</b></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 – e.g. 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). <b>(305)</b></p>	<p>It is considered planning policy within the LDP, notably ED9, and the decision making process ensures consideration is given to all relevant planning considerations when dealing with proposals for wind farms.</p> <p>It is considered that LDP policy on Renewable Energy and the Ironside Farrar Landscape Capacity study are useful starting points as material considerations for helping guide proposals for large turbines. This includes striking the balance between supporting renewable energy proposals as required by the Govt as well as giving weight to the protection of the landscape. Comments regarding the potential use of Common Good land are noted and the Council has been in contact with the respondent regarding the development of this.</p>	<p>No further action.</p> <p>Further discussions regarding opportunities for renewable energy projects on Selkirk Common Good land.</p>
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		<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.</p>	<p>When assessing applications for wind farms the Council requires and considers the standard of roads and any improvements required in order to deliver turbines onto the site. In considering planning applications for wind farms consideration is given to perceived impacts on the landscape and environment. This is often the most contentious part of such proposals and the most common reason for refusal. Communities in the southern part of the region are pursuing a Dark Sky project. When a Dark Sky area is identified and designated the Council would then get involved via the preparation of a Supplementary Planning Guidance. In essence this would confirm what the designation would mean in practice from a planning policy perspective and what consequent controls would be laid down with regards to proposed lighting. There is still much work to be done on this project and is it very much work in progress. The SPG will give clarity from a planning perspective once all the current unknowns are fully understood. It is understood the dark sky area is likely to cover a considerably large part of the southern Scottish Borders. As confirmed by the respondent Community Benefit Funds are outwith the scope of planning control and SBC has no authority to</p>	<p>If the dark skies area is designated the Council will produce a Supplementary Planning Guidance confirming the designated area and a planning policy for dealing with planning applications within the designation which proposes lighting.</p>
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		<p>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.<b>(307)</b></p> <p>There should be less wind farms and a balance between agriculture and forest planting. <b>(190)</b></p>	<p>alter this. Scottish Govt are aware of the delivery issues and it is understood this is being addressed.</p> <p>Comments noted.</p>	<p>No further action.</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	Proposed Response to Main Issues Raised	Recommendation
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. <b>(55, 151, 153, 179, 180, 184, 192, 263, 293)</b></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. <b>(23)</b></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. <b>(24)</b></p> <p>Support a National Park. Broughton to Peebles to Melrose To Jedburgh down to the English border including the Pentland hills. <b>(25)</b></p> <p>Support a National Park in the Tweed Valley. <b>(43, 95, 170, 229)</b></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.</p>	<p>This response is a general response in relation to all the summaries within this section which give support to a National Park within the Scottish Borders.</p> <p>The Main Issues Report was considered a suitable vehicle for seeking public opinion on the "Feasibility Study for a proposed Scottish Borders National Park" commissioned by a local campaign group has been submitted to the Council for consideration along with their Position Statement issued in September 2017. The study sets out the background to National Parks in Scotland, the challenges and needs of the southern Borders and seeks to identify the special qualities that would meet the qualifying criteria for the proposed designation. The study also seeks to quantify potential economic benefits, as well as the opportunities for landowners and tourism. The study sets out a number of options for a boundary to the park and also the possible governance arrangements,</p>	It is recommended that the Council notes the representations to the Main Issues Report and considers taking further action with a view to making a definitive decision as to whether or not to give its support to a National Park within the Scottish Borders and where this should be.

		<p>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. <b>(60)</b></p> <p>Support extending the Pentland Hills Country Park into Tweeddale. <b>(96)</b></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. <b>(105)</b></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. <b>(107)</b></p> <p>Support a National Park within the general area of the Scottish Borders proposed for consideration. <b>(116, 301)</b></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. <b>(124)</b></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</p>	<p>legislative powers it would have and what the operating costs would be.</p> <p>Feedback on this subject can enable the Council to better gauge the level of public support for the proposals, the attitude of key stakeholders, to test the key assertions being made in the campaign group's submission regarding proposed benefits and to investigate further what would be involved in the establishment of a park. It is only once this work has been completed that the Council will be in a position to determine whether it can support the establishment of a National Park in the Borders.</p> <p>The Main Issues Report consultation has confirmed from the representations received that there is more support for a National Park than those against. A wide range of reasons have been stated in support of such a designation and a number of possible locations for it have been suggested across the Scottish Borders including suggestions that it should cover the whole area. A number of reasons for opposing the designation have been submitted and it is noted that one of the objections has been</p>	
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		<p>representation. <b>(137)</b></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. <b>(143)</b></p> <p>I do agree with the suggestion of a National Park within the Scottish Borders. Glentress, Yarrow Valley. <b>(145)</b></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"</p>	<p>submitted by National Farmers Union in discussion with members.</p> <p>It is considered the Council should take note of all the responses made regarding the possibility of designating a National Park within the Scottish Borders and have further debate on this matter in order to form a collective opinion on whether or not to support such a designation and, if so, where the designation should be. Clearly there remain number of uncertainties and differing opinions on this matter including where it should be, governance matters, the role of the Council, how costs will be split, discussions with land owners, etc Should the Council wish to pursue this proposal further engagement would require to be carried out before formal support and approval from the Council would be sought for the designation. Should this matter be taken forward, the process to designate would take several years, therefore although this is an ongoing issue, it is expected that it would become more of a consideration for a future LDP. The designation of a National Park is ultimately a matter for Scottish Ministers following an assessment</p>	
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		<p>and "must visit" to tourists. <b>(146)</b></p> <p>3 potential areas - The Tweed Valley, Cheviots, Eildons. <b>(147)</b></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 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</p>	<p>and recommendation by Scottish Natural Heritage. Whilst the support of the Council for such a proposal would be a material consideration for Scottish Ministers it is unlikely to be the key determining factor in their final decision.</p>	
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		<p>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. <b>(152)</b></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</p>		
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		<p>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. <b>(160)</b></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 &amp; 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 &amp; individuality. Historically, this has been a neglected corner of Scotland. Yet, it is so significant in the national history. People would be astonished to discover &amp; enjoy this surprising destination instead of just passing through. <b>(190)</b></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</p>		
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		<p>whole of the Borders - and indeed stretch into D&amp;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. <b>(196)</b></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</p>		
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		<p>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"> <li>• generate a high profile</li> <li>• support its active management as well as its protection</li> <li>• encourage integrated planning and management by all public bodies, and</li> <li>• invest additional national resources in helping both residents and visitors to enjoy the landscape whilst conserving it for future generations.</li> </ul> <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> <p><b>PROPOSED SCOTTISH BORDERS NATIONAL PARK</b></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)</p>		
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		<p>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><b>SUBSEQUENT DEVELOPMENTS</b></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</p>		
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		<p>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 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 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."</p> <p>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</p>		
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		<p>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><b>TOWN AND COUNTRY PLANNING</b></p> <p>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><b>RESOURCES</b></p> <p>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</p>		
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		<p>income for the areas they cover than is spent on their relatively modest running costs. <b>(208)</b></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 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</p>		
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		<p>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. <b>(218)</b></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. <b>(169)</b></p> <p>Support a National Park. Suggested on area which extends and includes Melrose, Kelso, Kirk Yetholm, up to Norhumberland Council boundary,</p>		
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	<p>Newcastleton, land east of Hawick and Selkirk. <b>(171)</b></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. <b>(173)</b></p> <p>The Tweed Valley Forest Park would be a good start and give more control on rampant development. <b>(183)</b></p> <p>Support a National park. Glentress would be an ideal spot. <b>(185, 194)</b></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. <b>(187)</b></p> <p>Support proposals in the manor valley hills around Traquair and Minch Moor. <b>(189)</b></p> <p>Support a national park from Liddesdale up to Hawick. <b>(190)</b></p> <p>Support. Should potentially include some of Tweeddale. <b>(191)</b></p> <p>Support two. One to the east and one to the west so coastal and hill country. <b>(197)</b></p> <p>We support the designation of a National Park in</p>		
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		<p>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. <b>(199)</b></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. <b>(201)</b></p> <p>Support a National Park in the area that covers the Tweed between Drumelzier and Walkerburn, Manor Valley and the Meldons. <b>(204)</b></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. <b>(211)</b></p>		
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		<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 found in other national Parks. <b>(212)</b></p> <p>Support. Agree with suggestion to also include land adjoining St Mary's Loch along A708. <b>(215)</b></p> <p>Support if it would help tourism. <b>(216)</b></p> <p>Support a National Park in the Upper Tweed valley. <b>(222)</b></p> <p>The whole of the Scottish Borders should be designated a National park. <b>(223)</b></p> <p>Support a National Park but it would require a widely advertised consultation. <b>(225)</b></p> <p>Support in Eshiels / Tweed Valley/ Peebles / Glentress Forest and all the surrounding Areas. <b>(227)</b></p> <p>I support a National Park in the Borders. It should cover most of the Cheviots including Jedburgh and west to Newcastleton. <b>(230)</b></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. <b>(231)</b></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</p>		
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		<p>walking/cycling/horse riding routes that cross boundaries between each park to encourage cross pollination on visitors to both. <b>(232)</b></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. <b>(233)</b></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 huge potential. My question is how else could you possibly achieve this at such low cost and with so little effort? <b>(234)</b></p> <p>Yes, absolutely, lets protect the Tweed Valley and further improve the tourist draw of the area!</p>		
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		<p>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. <b>(239)</b></p> <p>Yes - but I don't have enough information to make suggestions about location. <b>(244)</b></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). <b>(253)</b></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. <b>(262)</b></p> <p>Yes, it should cover the Eildon / Dryburgh areas around the river Tweed. <b>(272)</b></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. <b>(274)</b></p>		
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		<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. <b>(277)</b></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. <b>(278)</b></p> <p>Support. It should cover heritage town sites such as Lauder and scenic and recreation areas. <b>(279)</b></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 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. <b>(280)</b></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</p>		
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	<p>Cheviot hills, the hills surrounding Hawick and the Teviot valley, extending north to include the Tweedsmuir Hills. <b>(284)</b></p> <p>Yes I support it. It should include the Lammermuir Hills. <b>(286)</b></p> <p>Yes I support it. It should be the old Roxburgh area. <b>(287)</b></p> <p>Yes, we fully support it. Generally to the south of the Tweed, and including all of the hill areas at the headwaters. <b>(290)</b></p> <p>Selkirk and its surrounding area offers many opportunities to support National Park status. <b>(291)</b></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. <b>(295)</b></p> <p>Yes, Bonchester Bridge area. <b>(296)</b></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'. <b>(297)</b></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</p>		
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		<p>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. <b>(299)</b></p> <p>Yes, Tweeddale. <b>(300)</b></p> <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. <b>(318)</b></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. <b>(27)</b></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. <b>(155)</b></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</p>	<p>This response is a general response in relation to all the summaries within this section which object to a National Park within the Scottish Borders.</p> <p>The Main Issues Report was considered a suitable vehicle for seeking public opinion on the "Feasibility Study for a proposed Scottish Borders National Park" commissioned by a local campaign group has been submitted to the Council for consideration along with their Position Statement issued in September 2017. The study sets out the background to National Parks in Scotland, the challenges</p>	<p>It is recommended that the Council notes the representations to the Main Issues Report and considers taking further action with a view to making a definitive decision as to whether or not to give its support to a National Park within the Scottish Borders and where this should be.</p>

		<p>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. <b>(161)</b></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</p>	<p>and needs of the southern Borders and seeks to identify the special qualities that would meet the qualifying criteria for the proposed designation. The study also seeks to quantify potential economic benefits, as well as the opportunities for landowners and tourism. The study sets out a number of options for a boundary to the park and also the possible governance arrangements, legislative powers it would have and what the operating costs would be.</p> <p>Feedback on this subject can enable the Council to better gauge the level of public support and opposition to the proposals, the attitude of key stakeholders, to test the key assertions being made in the campaign group's submission regarding proposed benefits and to investigate further what would be involved in the establishment of a park. It is only once this work has been completed that the Council will be in a position to determine whether it can support the establishment of a National Park in the Borders.</p> <p>The Main Issues Report consultation has confirmed from the representations received that there is more support for a National Park</p>	
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		<p>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. <b>(165)</b></p> <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</p>	<p>than those against. A wide range of reasons have been stated in support of such a designation and a number of possible locations for it have been suggested across the Scottish Borders including suggestions that it should cover the whole area. A number of reasons for opposing the designation have been submitted and it is noted that one of the objections has been submitted by National Farmers Union in discussion with members.</p> <p>It is considered the Council should take note of all the responses made regarding the possibility of designating a National Park within the Scottish Borders and have further debate on this matter in order to form a collective opinion on whether or not to support such a designation and, if so, where the designation should be. Clearly there remain number of uncertainties and differing opinions on this matter including where it should be, governance matters, the role of the Council, how costs will be split, discussions with land owners, etc Should the Council wish to pursue this proposal further engagement would require to be carried out before formal support and approval from the Council would be sought for the designation.</p>	
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		<p>more effective means of delivering sustainable economic development across the Region than a National Park with its principal aims focused on planning and conservation. <b>(174)</b></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. <b>(182)</b></p> <p>The proposal doesn't seem justified. <b>(209)</b></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</p>	<p>Should this matter be taken forward, the process to designate would take several years, therefore although this is an ongoing issue, it is expected that it would become more of a consideration for a future LDP. The designation of a National Park is ultimately a matter for Scottish Ministers following an assessment and recommendation by Scottish Natural Heritage. Whilst the support of the Council for such a proposal would be a material consideration for Scottish Ministers it is unlikely to be the key determining factor in their final decision.</p>	
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		<p>the whole region will reap benefit from a proportion being designated a National Park. <b>(210)</b></p> <p>Don't support as proposed. Difficult to draw a boundary owing to quality within most of Scottish Borders. <b>(236)</b></p> <p>Don't support - it is another level of bureaucracy and cost for limited, if any, benefit. <b>(240)</b></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. <b>(251)</b></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. <b>(260)</b></p> <p>I think a National park could limit, not enhance, economic activity. <b>(261)</b></p> <p>Don't support. <b>(90, 276, 283, 292)</b></p> <p>Don't support – waste of time and money. <b>(281)</b></p> <p>No ...if houses are being built everywhere .where is there going to be any green spaces left to make national park? <b>(285)</b></p> <p>No - with the information currently available to us we are not convinced that Kelso should be</p>		
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		<p>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. <b>(288)</b></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. <b>(315)</b></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> <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</p>		
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		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>VisitScotland will confirm that the marketing model</p>		
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	<p>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 &amp; 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> <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</p>		
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		<p>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</p>		
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		<p>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. <b>(307)</b></p>		
<p>Designation of National Park within Scottish Borders: Question 14</p>	<p>General comments</p>	<p>SBC says that support for this is unlikely to be material to the Scot Govt. BUT...what do we think? <b>(93)</b></p> <p>SLE takes a pragmatic view to the creation of new</p>	<p>This response is a general response in relation to all the summaries within this section</p> <p>The Main Issues Report was</p>	<p>It is recommended that the Council notes the representations to</p>

		<p>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</p>	<p>considered a suitable vehicle for seeking public opinion on the "Feasibility Study for a proposed Scottish Borders National Park" commissioned by a local campaign group has been submitted to the Council for consideration along with their Position Statement issued in September 2017. The study sets out the background to National Parks in Scotland, the challenges and needs of the southern Borders and seeks to identify the special qualities that would meet the qualifying criteria for the proposed designation. The study also seeks to quantify potential economic benefits, as well as the opportunities for landowners and tourism. The study sets out a number of options for a boundary to the park and also the possible governance arrangements, legislative powers it would have and what the operating costs would be.</p> <p>Feedback on this subject can enable the Council to better gauge the level of public support and opposition to the proposals, the attitude of key stakeholders, to test the key assertions being made in the campaign group's submission regarding proposed benefits and to investigate further what would be</p>	<p>the Main Issues Report and considers taking further action with a view to making a definitive decision as to whether or not to give its support to a National Park within the Scottish Borders and where this should be.</p>
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	<p>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</p>	<p>involved in the establishment of a park. It is only once this work has been completed that the Council will be in a position to determine whether it can support the establishment of a National Park in the Borders.</p> <p>The Main Issues Report consultation has confirmed from the representations received that there is more support for a National Park than those against. A wide range of reasons have been stated in support of such a designation and a number of possible locations for it have been suggested across the Scottish Borders including suggestions that it should cover the whole area. A number of reasons for opposing the designation have been submitted and it is noted that one of the objections has been submitted by National Farmers Union in discussion with members.</p> <p>It is considered the Council should take note of all the responses made regarding the possibility of designating a National Park within the Scottish Borders and have further debate on this matter in order to form a collective opinion on whether or not to support such a designation and, if so, where the designation should be. Clearly</p>	
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		<p>farmed. As such there is concern that in some areas tourism and 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><b>Board Representation</b> 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 &amp; 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><b>National Park Boundary</b> 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</p>	<p>there remain number of uncertainties and differing opinions on this matter including where it should be, governance matters, the role of the Council, how costs will be split, discussions with land owners, etc Should the Council wish to pursue this proposal further engagement would require to be carried out before formal support and approval from the Council would be sought for the designation. Should this matter be taken forward, the process to designate would take several years, therefore although this is an ongoing issue, it is expected that it would become more of a consideration for a future LDP. The designation of a National Park is ultimately a matter for Scottish Ministers following an assessment and recommendation by Scottish Natural Heritage. Whilst the support of the Council for such a proposal would be a material consideration for Scottish Ministers it is unlikely to be the key determining factor in their final decision.</p>	
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		<p>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 &amp; 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 &amp; the Trossachs or the Cairngorms, for example embracing sea as well as land, or resting in a single local authority area.</p>		
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		<p>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. <b>(213)</b></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. <b>(243)</b></p> <p>Unsure about this. Would need more information. <b>(250)</b></p> <p>Support only if it does not disadvantage the residents by strangling development. <b>(258)</b></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? <b>(289)</b></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 be 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. <b>(312)</b></p>		
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		<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. <b>(305)</b></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	Proposed Response to Main Issues Raised	Recommendation
Regeneration: Question 15	Agree with preferred option	The contributor agrees with the proposed redevelopment sites to be allocated within the Local Development Plan. <b>(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)</b>	Support noted.	It is recommended to take the preferred option from the Main Issues Report forward into the Proposed Local Development Plan.  However, it is recommended that the redevelopment sites at Parkside Primary School (RJEDB004) and the Former Tennis Court/ Ski Slope (RJEDB005) be excluded from the Proposed Local Development Plan.
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. <b>(27, 43, 95, 194, 285)</b>	Comments noted.	No changes recommended.
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	Comments noted. It is considered appropriate to add the following site requirement to new identified redevelopment sites.	It is recommended that the new redevelopment allocations added to the Proposed Plan will include the

		the site requirements. <b>(213)</b>	<ul style="list-style-type: none"> <li>Protected species may be present within the site and further assessment on nature conservation will be required.</li> </ul>	site requirement shown in relation to protected species.
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. <b>(166)</b>	Comments noted. The adopted Local Development Plan 2016 allocated redevelopment opportunities across the Borders, although these allocations are not exhaustive. Policy ED5 – Regeneration of the Local Development Plan refers to the development of non-allocated brownfield sites in addition to the identified redevelopment allocations. It is intended to carry this policy forward into the Proposed Local Development Plan to allow for regeneration throughout the Scottish Borders.	No changes recommended.
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. <b>(168)</b>	Support noted.	No changes recommended.
Regeneration: Question 15	All proposed redevelopment allocations	The contributor states they do not know enough about these sites but the principle outlined seems sound. <b>(197)</b>	Comments noted.	No changes recommended.
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. Redevelopment 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.	<p>Comments noted.</p> <p>The Proposed Local Development Plan includes a site requirement for a Flood Risk Assessment to be undertaken.</p> <p>Foul water disposal will be dealt with by relevant authorities at the</p>	<p>It is recommended that Former Town Hall, Eyemouth (REYEM007) is included within the Proposed Local Development Plan.</p> <p>Therefore it is</p>

		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 connected to the foul sewer. <b>(119)</b>	planning application stage.	recommended that the site requirements within the Proposed Plan for REYEM007 are updated to include the requirement for a Flood Risk Assessment.
Regeneration: Question 15	<p>Eyemouth – REYEM007, Former Town Hall</p> <p>Jedburgh – RJEDB005, Former Tennis Court/ Ski Slope</p> <p>Hawick – RHAWI017, Former Peter Scott Building RHAWI018, Buccleuch Mill</p>	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. <b>(164)</b>	Support noted, although site RJEDB005 should not been included within the plan.	Sites REYEM007, RHAWI017 and RHAWI018 are included within the Proposed Plan.
Regeneration: Question 15	Hawick – RHAWI017, Former Peter Scott Building	The contributor requires 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	<p>Comments noted. The site requirement within the Proposed LDP already make reference to the requirement for a FRA and investigation into any contamination.</p> <p>The following site requirements have been added:</p>	It is recommended that Former Peter Scott Building, Hawick (RHAWI017) is included within the Proposed Local Development Plan.

		<p>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. <b>(119)</b></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. <b>(213)</b></p>	<ul style="list-style-type: none"> <li>• The need for a Sustainable Urban Drainage System within the site to deal with surface water</li> </ul> <p>As part of the Development Management process consultations will be carried out with SEPA and the Flood Prevention officer. The opportunities for direct links for walking and cycling will be addressed at the planning application stage between Howiegate and Buccleuch Street.</p> <p>Foul water disposal will be dealt with by relevant authorities at the planning application stage.</p>	<p>The following site requirements have been added:</p> <ul style="list-style-type: none"> <li>• The need for a Sustainable Urban Drainage System within the site to deal with surface water</li> </ul>
Regeneration: Question 15	Hawick – RHAWI018, Buccleuch Mill	<p>The contributor 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 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</p>	<p>Comments noted. The site requirement within the Proposed LDP already make reference to the requirement for a FRA and investigation into any contamination.</p> <p>The following site requirements have been added:</p> <ul style="list-style-type: none"> <li>• The need for a Sustainable Urban Drainage System within the site to deal with surface water</li> </ul>	<p>It is recommended that Buccleuch Mill, Hawick (RHAWI018) is included within the Proposed Local Development Plan.</p> <p>The following site requirements have been added:</p> <ul style="list-style-type: none"> <li>• The need for a Sustainable Urban Drainage</li> </ul>

		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. <b>(119)</b>	As part of the Development Management process consultations will be carried out with SEPA and the Flood Prevention officer.  Foul water disposal will be dealt with by relevant authorities at the planning application stage.	System within the site to deal with surface water
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. <b>(152, 218)</b>	Following the Main Issues Report consultation process, the former Hobkirk Primary School has been assessed as a potential redevelopment site. The outcome of the site assessment states:  <i>'Whilst the principle of the redevelopment of this site is considered to be acceptable, it is not considered appropriate to allocate a rural site of this nature, which is detached from any settlement and services. Issues relating to flooding and biodiversity would require to be investigated. The acceptability or otherwise of the site for redevelopment would be better explored through the process of a planning application'.</i>	It is recommended that the Former Hobkirk Primary School, Hobkirk (RHOBK001) is not included within the Proposed Local Development Plan.
Regeneration: Question 15	Jedburgh – RJEDB003, Howdenburn Primary School	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	Comments noted.  The site requirements within the Proposed Plan make reference to the requirements for both water and drainage impact	It is recommended that Howdenburn Primary School, Jedburgh (RJEDB003) is included within the

		<p>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. <b>(119)</b></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. <b>(213)</b></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). <b>(254)</b></p>	<p>assessments. The Flood Prevention officer and SEPA will be consulted on any planning application for the development of the site and surface water and water environmental considerations will be dealt with as part of the consultation process with relevant bodies at the planning application stage.</p> <p>In relation to the comments on playing fields, the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 (Schedule 5) define 'outdoor sports facilities' as land used as:</p> <ul style="list-style-type: none"> <li>• an outdoor playing field extending to not less than 0.2 hectares used for any sport played on a pitch</li> <li>• an outdoor athletics track</li> <li>• a golf course</li> <li>• an outdoor tennis court, other than those within a private dwelling, hotel or other tourist accommodation</li> <li>• an outdoor bowling green</li> </ul> <p>The playing fields within the Howdenburn Primary School site (RJEDB003) have a total area of 1.1ha. Therefore a site requirement will be added to the</p>	<p>Proposed Local Development Plan.</p> <p>The site requirements have been updated to include reference to ensuring account has been taken with regards to the existing on-site sports facility</p>
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			Proposed Local Development Plan which makes reference 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 Scottish Planning Policy.	
Regeneration: Question 15	Jedburgh – RJEDB004, Parkside Primary School	<p>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. <b>(119)</b></p> <p>The contributor states the Council should integrate the site with existing footpath network along the southern boundary. <b>(213)</b></p>	Comments noted. Following the Main Issues Report consultation process it has been decided to not take forward the proposed redevelopment opportunity at Parkside Primary School, Jedburgh (RJEDB004). It is intended that the site will be used to provide access and a parking area for the new intergenerational campus as per planning application 17/01363/FUL.	It is recommended that the Parkside Primary School, Jedburgh (RJEDB004) is not included within the Proposed Local Development Plan.
Regeneration: Question 15	Jedburgh – RJEDB005, Former Tennis Court/ Ski Slope	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	Comments noted. It is acknowledged that the site is heavily constrained due to flood risk and the contributor considers the most sustainable solution would be to revert this area to open space. Although it is felt there may be opportunities for a variety of uses on the site. However, rather than formally allocate the site within the Proposed Plan it is considered more appropriate for	It is recommended that the Former Tennis Court/ Ski Slope, Jedburgh (RJEDB005) is not included within the Proposed Local Development Plan.



		<p>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. <b>(119)</b></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. <b>(213)</b></p>	<p>redevelopment of the site to be explored through the development management process and the site to be assessed as an infill opportunity.</p> <p>It should be noted that if this site was to be included in the Proposed Plan it would also be included in the associated Habitats Regulations Appraisal (HRA) and an appropriately site requirement would be included within the Plan.</p> <p>In conclusion, following the Main Issues Report consultation process it has been decided to not take forward the redevelopment opportunity at the Former Tennis Court/ Ski Slope, Jedburgh (RJEDB005).</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</p>	<p>Comments noted.</p> <p>Site requirements have been added to site RJEDB006 and it is considered they cover the points identified by SEPA. All matters will be discussed and considered in greater detail as part of the planning consultation with SEPA. There is also reference to the pedestrian link between High Street and Friarsgate, via the</p>	<p>It is recommended that Jedburgh Grammar School, Jedburgh (RJEDB006) is included within the Proposed Local Development Plan.</p>

		<p>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. <b>(119)</b></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 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. <b>(213)</b></p>	<p>school grounds should be retained and enhanced</p> <p>As it is not intended that the Former Tennis Court/ Ski Slope (RJEDB005) be allocated within the Proposed Plan, it is not intended that a joint Planning Brief be produced for RJEDB005 and RJEDB006.</p>	
Regeneration: Question 15	Coldstream	<p>The contributor states that the town with significant heritage assets that needs attention and has not benefitted from a CARS scheme is Coldstream. <b>(236)</b></p>	Comments noted.	No changes recommended.
Regeneration: Question 15	Galashiels	<p>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</p>	Comments noted.	Elements of the Galashiels Masterplan will be developed and investigated further.

		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. <b>(294)</b>		
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 at one of the remaining mill sites. The contributor also mentions two mill buildings in Galashiels which may be suitable for redevelopment. <b>(24)</b>	Comments noted. The Council is currently running a shopfront improvement scheme in five Borders towns which includes Galashiels. This grant is available to help improve exterior shop frontages and thereby enhancing the appearance of the town centre.  Elements of the Galashiels Masterplan will be developed and investigated further.  The two mill buildings submitted by the contributor were not within the ownership of the contributor but could potentially be developed through the development management process by submission of a planning application.	Elements of the Galashiels Masterplan will be developed and investigated further.
Regeneration: Question 15	Galashiels	The contributor states that Galashiels has had a huge amount of investment for a new Railway	Comments noted. The existing Local Development Plan includes	Elements of the Galashiels

		<p>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. <b>(227)</b></p> <p>The contributor notes that other sites should be included within Galashiels although no sites are identified. <b>(276)</b></p>	<p>eight redevelopment allocations within Galashiels all of which will be carried forward into the next Local Development Plan.</p> <p>Elements of the Galashiels Masterplan will be developed and investigated further.</p> <p>It should also be noted that the redevelopment of brownfield sites is already included within Policy ED5: Regeneration of the Local Development Plan. This policy supports the development of allocated and non-allocated brownfield sites where specific criteria are met.</p>	<p>Masterplan will be developed and investigated further.</p>
Regeneration: Question 15	Galashiels and Hawick	<p>The contributor states that Galashiels, Hawick and Penicuik all need regeneration <b>(43)</b></p>	<p>Comments noted. The Local Development Plan includes a number of redevelopment allocations within Galashiels and Hawick which will be carried forward into the next Local Development Plan. Penicuik does not fall within the Scottish Borders Council area.</p>	<p>Although the Council will continue to consider opportunities for regenerating Galashiels and Hawick.</p>
Regeneration: Question 15	Innerleithen	<p>The contributor does not support any redevelopment in Innerleithen. <b>(162)</b></p>	<p>Comments noted. The existing redevelopment allocation at the High Street Gap Site (zRO9) has been developed and will be removed from the Plan. Therefore there are no redevelopment sites identified in Innerleithen.</p>	<p>No changes recommended.</p>
Regeneration: Question 15	Jedburgh	<p>The contributor agrees with the preferred site allocation for redevelopment, with respect to the Cheviot Locality. <b>(312)</b></p>	<p>Comments noted.</p>	<p>No changes recommended.</p>

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. <b>(287)</b>	The Council will investigate ways in which the Carlisle Airport can benefit Newcastleton. SOSEP/Borderlands may be able to develop opportunities. New build opportunities are limited due to flood risk.	The Council will investigate ways in which the Carlisle Airport can benefit Newcastleton
Regeneration: Question 15	Peebles	The contributor states that March Street Mill, Peebles should be redeveloped for the community. <b>(273)</b>	Comments noted. The site at March Street Mills, Peebles was allocated as a mixed use site within the Housing Supplementary Guidance. One of the site requirements for the site states ' <i>the site must provide a mix of uses including housing, employment and potentially commercial and community use</i> '.  The other issues identified by the contributor are more local issues which do not fall within the remit of the Local Development Plan. These issues should be raised with the relevant teams within the Council who will be able to address any specific concerns.	No changes recommended.
Regeneration: Question 15	Selkirk	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: <ul style="list-style-type: none"> <li>• The impact of the A7T through the centre of the town and support for the establishment of a by-pass;</li> <li>• Public safety/ air and noise pollution/ structural damage/ disruption caused by heavy multi axle vehicles negotiating the A7T;</li> <li>• Lack of available parking and lack of parking management control;</li> <li>• Haphazard parking causing damage to footways</li> </ul>	Comments noted. Reference to the potential Selkirk by-pass will continue to be included within the Proposed Local Development Plan.	No changes recommended.

		<p>and blocking pedestrian/ disabled access; and</p> <ul style="list-style-type: none"> <li>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. <b>(305)</b></li> </ul>		
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. <b>(184)</b>	It is disagreed that there are too many proposals compared to other towns. There are no new redevelopment sites identified within Peebles. The existing Local Development Plan includes three redevelopment allocations within Peebles which will be carried forward into the next Local Development Plan.	No changes recommended.
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. <b>(272)</b>	Support noted. Although the Local Development Plan allocates redevelopment opportunities these sites are not exhaustive. Local Development Plan Policy ED5 - Regeneration supports development of non-allocated brownfield land if the specific criteria set out within the policy are met. This would allow suitable regeneration opportunities to be developed in the future.	No changes recommended.
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. <b>(207)</b>	Comments noted. In addition to the identified redevelopment sites there are a number of business and industrial and mixed use sites allocated throughout the Scottish Borders to help promote business growth and employment where a need has been recognised.	No changes recommended.
Regeneration:	General	The contributor considers redevelopment of the	Comments noted. In addition to	No changes

Question 15		<p>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. <b>(155, 172)</b></p> <p>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. <b>(216)</b></p>	<p>the identified redevelopment sites there are a number of business and industrial and mixed use sites allocated throughout the Scottish Borders to help promote business growth and employment where a need is recognised. Peebles has a shortage of readily available business land and premises.</p> <p>It is felt that where appropriate redevelopment sites have been identified throughout the Scottish Borders and are not concentrated within Peebles.</p>	recommended.
Regeneration: Question 15	General	<p>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 Park in Hawick, as open space than if they were built upon. <b>(182)</b></p>	<p>Comments noted. It is acknowledged that the redevelopment sites within the Proposed Local Development Plan are suitable for a variety of uses which may include open space. Clearly there can be significant costs in carrying out this work e.g. demolition costs, potential contamination, implementing the open space and maintenance costs.</p> <p>It should be noted that the Proposed Local Development Plan also identifies key greenspaces within towns and</p>	

			villages throughout the Borders. These green spaces are protected due to their community and amenity value.	
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. <b>(185)</b>	Comments noted.	No changes recommended.
Regeneration: Question 15	General	The contributor requests that there is more focus on Liddesdale and Hermitage. <b>(190)</b>	Comments noted. Policy ED5-Regeneration supports development of brownfield sites even those that are not specifically identified by allocation.	No changes recommended.
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. <b>(201)</b>	Comments noted. The existing Local Development Plan includes eight redevelopment allocations within Galashiels all of which will be carried forward into the next Local Development Plan.  These existing allocations will be carried forward into the Proposed Plan. It should also be noted that these sites are not exhaustive. Local Development Plan Policy ED5 - Regeneration supports development of non-allocated brownfield land if the specific criteria set out within the policy are met.	
Regeneration: Question 15	General	The contributor states that any sites that can be redeveloped should be used before green field sites. <b>(203)</b>	Comments noted. The Local Development Plan allocated redevelopment opportunities across the Borders, although	No changes recommended.



			these allocations are not exhaustive. Policy ED5 – Regeneration of the Local Development Plan refers to the development of non-allocated brownfield sites in addition to redevelopment allocations. It is intended to carry this policy forward into the Proposed Local Development Plan.	
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. <b>(239)</b>	Comments noted. Although the Local Development Plan allocates redevelopment opportunities these sites are not exhaustive. Local Development Plan Policy ED5 - Regeneration supports development of non-allocated brownfield land if the specific criteria set out within the policy are met.	No changes recommended.
Regeneration: Question 15	General	The contributor does agree with regeneration development in older brownfield sites. <b>(243)</b>	Comments noted.	No changes recommended.
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. <b>(258)</b>	Comments noted. The reality is the Council would not have the man power or finance to implement the respondent's suggestion for the many sites across the region this would involve.	No changes recommended.
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. <b>(277)</b>	Comments noted. The Local Development Plan has allocated redevelopment opportunities across the Borders, although these allocations are not exhaustive. Policy ED5 – Regeneration of the Local	No changes recommended.

			Development Plan refers to the development of non-allocated brownfield sites in addition to redevelopment allocations. It is intended to carry this policy forward into the Proposed Local Development Plan.	
Regeneration: Question 15	General	The contributor suggests that all brownfield sites be included within the plan unless there are specific reasons not to include. <b>(289)</b>	Comments noted. The redevelopment of brownfield sites are already included within Local Development Plan Policy ED5: Regeneration. This policy supports the development of allocated and non-allocated brownfield sites where specific criteria are met as stated within the policy. It is not feasible to formally allocate every single brownfield within the Scottish Borders for regeneration purposes as policy ED5 would test proposals on these sites.	No changes recommended.
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. <b>(292)</b>	Comments noted. The allocation of redevelopment sites within the Proposed Local Development Plan may allow a variety of uses to be developed on the site.  In addition to the identified redevelopment sites there are a number of business and industrial and mixed use sites allocated throughout the Scottish Borders to help promote business growth and employment.	No changes recommended.
Regeneration: Question 15	General	The contributor notes that the Council seeks to <i>"promote the regeneration of town centres to make</i>	Support and comments noted. There are a number of	No changes recommended.

		<p><i>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 character of the wider area. <b>(10)</b></p>	<p>redevelopment sites within the Local Development Plan that include listed buildings. The Council are willing to work with landowners and developers to support redevelopment of these sites in a sympathetic and appropriate way. However, there remains a statutory duty for the Council to safeguard and enhance the build heritage, although in extreme instances the demolition of listed structures can be considered with the agreement of HES where required.</p>	
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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	Proposed Response to Main Issues Raised	Recommendation
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. <b>(168, 171, 181, 197, 222, 230, 243, 259, 274, 289, 290, 296, 299)</b>	Support noted.	It is recommended that the Council agree to include a new development boundary and settlement statement for Oxnam within the Proposed Local Development Plan.
Settlement Maps: Question 16	Disagree with proposal	The contributor does not support the principal of Oxnam becoming a recognised settlement within the LDP. <b>(95, 179, 248, 285, 291)</b>	Comments noted.	No changes recommended.
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". <b>(124)</b>	Comments noted.	No changes recommended.
Settlement Maps:	General	The contributor notes that the proposed settlement	Comments noted. The	It is recommended

Question 16		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). <b>(213)</b>	settlement statement for Oxnam will include a reference to the settlement boundary being contiguous with the boundary of the River Tweed Special Area of Conservation and will include a general requirement for Habitats Regulations Appraisal of any forthcoming proposal(s).	that the Council agree to include a reference to the River Tweed Special Area of Conservation and the general requirement for Habitats Regulations Appraisal of any forthcoming proposal(s) within the Oxnam settlement statement.
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## 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	Proposed Response to Main Issues Raised	Recommendation
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. <b>(195, 215, 231, 243, 312)</b></p>	Comments noted.	No further action required.
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>Support and comments noted.</p> <p>Following consultation on the Main Issues Report, it is considered appropriate that the Newcastleton Prime Frontage/Core Area designation as contained within the Supplementary Planning Guidance on Replacement Windows and Doors be removed. As a result of this, all applications in relation to</p>	It is recommended that the Council agree to remove the Newcastleton Prime Frontage/Core Area designation as contained within the Supplementary Planning Guidance on Replacement



		<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.</p> <p><b>(171, 181, 190, 192, 206, 230, 274, 276, 289, 290, 291, 292, 296, 307)</b></p>	<p>replacement windows and doors within the Newcastleton Conservation Area would be assessed against the “Elsewhere in Conservation Areas” element of the policy contained within the Supplementary Planning Guidance on Replacement Windows and Doors.</p>	<p>Windows and Doors.</p>
<p>Settlement Map: Question 17</p>	<p>Newcastleton Core Frontage Designation - General</p>	<p>The contributor states that they would support the proposal to remove the Core Frontage designation within Newcastleton only if this is in the longer term interest of Newcastleton and provided the local community (via the Community Council) supports the proposal. <b>(305)</b></p>	<p>Support and comments noted.</p> <p>Following consultation on the Main Issues Report, it is considered appropriate that the Newcastleton Prime Frontage/Core Area designation as contained within the Supplementary Planning Guidance on Replacement Windows and Doors be removed. As a result of this, all applications in relation to replacement windows and doors within the Newcastleton Conservation Area would be assessed against the “Elsewhere in Conservation Areas” element of the policy contained within the</p>	<p>It is recommended that the Council agree to remove the Newcastleton Prime Frontage/Core Area designation as contained within the Supplementary Planning Guidance on Replacement Windows and Doors.</p>

			Supplementary Planning Guidance on Replacement Windows and Doors.	
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</p>	<p>Comments noted.</p> <p>However, following consultation on the Main Issues Report, it is considered appropriate that the Newcastleton Prime Frontage/Core Area designation as contained within the Supplementary Planning Guidance on Replacement Windows and Doors be removed. As a result of this, all applications in relation to replacement windows and doors within the Newcastleton Conservation Area would be assessed against the "Elsewhere in Conservation Areas" element of the policy contained within the Supplementary Planning Guidance on Replacement Windows and Doors.</p> <p>In respect to comments regarding the removal of the Newcastleton Prime Frontage/Core Area designation from the Supplementary Planning Guidance on Replacement Windows and Doors; it should be noted that it is considered that the unique character of Newcastleton Conservation Area is established by its formal street layout with a central square and two secondary squares. It is considered to be the best example of a late 18th century</p>	It is recommended that the Council agree to remove the Newcastleton Prime Frontage/Core Area designation as contained within the Supplementary Planning Guidance on Replacement Windows and Doors.

		<p>imaginative presentation which can be effectively understood by a remote rural community. <b>(209, 252, 277, 280)</b></p>	<p>planned village in the Borders and the majority of the settlement is designated as a Conservation Area. Newcastleton has a distinct grid iron layout and displays distinct building styles and architectural details. It is therefore not considered that the removal of the Prime Frontage/Core Area designation will impact negatively on this aforementioned formal street layout.</p>	
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## 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	Proposed Response to Main Issues Raised	Recommendation
Appendix 3	All policies	The contributor agrees with the suggested policy amendments identified in Appendix 3. <b>(171, 192, 206, 230, 259, 274, 283, 288, 296, 312)</b>	Support noted	Policy amendments implemented within proposed LDP
Appendix 3	All policies	The contributor generally agrees with the suggested policy amendments identified in Appendix 3. <b>(215)</b>	Comments noted	Policy amendments implemented within proposed LDP
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. <b>(272)</b>	Comments noted	Policy amendments implemented within proposed LDP
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. <b>(222)</b>	Disagree. It is considered all planning decisions give full weighting to all material considerations	Policy amendments implemented within proposed LDP
Appendix 3	All policies	The contributor states that they do not agree with the suggested policy amendments identified in Appendix 3. <b>(311)</b>	Comments noted	Policy amendments implemented within proposed LDP
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. <b>(323)</b>	Comments noted	Policy amendments implemented within proposed LDP
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. <b>(101)</b>	Comments noted	Policy amendments implemented within proposed LDP
Appendix 3	All policies	Although the contributor does not consider herself qualified to judge – she hopes that the principles of fairness and equality and	Comments noted. It is considered all planning decisions give full weighting to all material	Policy amendments implemented within proposed LDP

		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. <b>(197)</b>	considerations	
Place Making and Design	Policy PMD1 Sustainability	<p>The contributor welcomes and supports the continuation and updating of this policy. The contributor welcomes that the comments they have previously made have been taken into account, and consider that policies PMD1 and PMD2 alongside Policy EP12 Green Network are important to the major of the policies in the plan. <b>(119)</b></p> <p>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. <b>(199)</b></p>	<p>Support and comments noted.</p> <p>Comments noted. It is considered more appropriate that a reference to the Land Use Strategy (LUS) be included within the introductory text of Volume 1 of the Plan. It is felt that this is more appropriate as the LUS is relevant to many aspects of the Local Development Plan rather than solely this specific policy.</p>	It is recommended that Policy PMD1: Sustainability is substantially retained. Minor updates have been made to the Sustainability and Accessibility sections of the policy to reflect the Council's corporate approach to Sustainability.
Place Making and Design	Policy PMD2 Quality Standards	<p>The contributor welcomes and supports the continuation and updating of this policy. The contributor welcomes that the comments they have previously made have been taken into account, and consider that policies PMD1 and PMD2 alongside Policy EP12 Green Network are important to the major of the policies in the plan. <b>(119)</b></p> <p>The contributor continues to support the inclusion in Sustainability subsection a) of the standards that require developers to</p>	<p>Support and comments noted.</p> <p>Comments noted. It is acknowledged the contributor is happy to continue working with the</p>	It is recommended that Policy PMD1: Sustainability is substantially retained. Minor updates have been made to the Sustainability and Accessibility sections of the policy to reflect the Council's corporate

		<p>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. <b>(119)</b></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. <b>(119)</b></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. <b>(119)</b></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. <b>(213)</b></p>	<p>Council in the drafting of policy wording which reflects the ambitions of the Council and this policy.</p> <p>Comments noted.</p> <p>Comments noted. The Waste Management Supplementary Guidance has been produced and is an approved document however the contributor will be encouraged to assist when the document is updated.</p> <p>Comments noted. It is not felt that a specific cross-reference to Policy EP12 is required as the policy currently states '<i>This policy is relevant to most policies within the Plan.</i>'</p>	<p>approach to Sustainability.</p> <p>It is also recommended that the introductory text of Policy PMD1 will be updated to reflect changes in Building Standards Technical Standards.</p>
Place Making and Design	Policy PMD3 Land Use Allocations	The contributor supports the retention of this policy. <b>(119)</b>	Support noted.	It is recommended the policy is substantially retained.

<p>Place Making and Design</p>	<p>Policy PMD4 Development Outwith Development Boundaries</p>	<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. <b>(111, 114)</b></p> <p>The contributor supports the retention of this policy. <b>(119)</b></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. <b>(153)</b></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. <b>(214)</b></p>	<p>Comments noted. It is considered that the reference to the Housing Land Audit (HLA) within the policy should be retained. HLAs are the established means for monitoring housing land supply. The HLA is undertaken annually and uses the most up to date information available.</p> <p>Support noted.</p> <p>Comments noted. All allocations within the Local Development Plan are thoroughly assessed to ensure they are appropriate for the proposed location. This site assessment process includes consultation with various stakeholders including Scottish Water, NHS and Education which ensures the correct infrastructure is available or planned to support the development.</p> <p>Comments noted. As part of the Local Development Plan process sites within and outwith development boundaries are assessed however it is often necessary to extend development boundaries to allocate new sites. When allocating sites various factors are considered including consideration of the responses received during the public</p>	<p>It is recommended the policy is substantially retained.</p>
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Place Making and Design	Policy PMD5 Infill Development	<p>The contributor supports the retention of this policy. <b>(119)</b></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. <b>(277)</b></p>	<p>Support noted.</p> <p>It is considered that the policy contained within the LDP works well in practice and provides careful control of infill development within the Scottish Borders.</p>	It is recommended the policy is substantially retained.

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. <b>(119)</b></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. <b>(214)</b></p>	Support noted. The Council's Economic Development Section record and monitor business land enquiries.	No action required.
Economic Development	Policy ED1 Protection of Business and Industrial Land	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. <b>(305)</b>	Comments noted. These would be explored further in the event of the delivery of a Selkirk by-pass.	No action required.
Economic Development	Policy ED4 Core Activity Areas in Town Centres	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. <b>(318)</b>	Comments noted. Following consultation with the Development Management Team it was agreed there would be no fundamental change to the Core Activity Area for Peebles. Additional flexibility will be incorporated into the policy in line with the Town Centre Core Activity Area Pilot Study.	<p>It is recommended that Policy ED4 be updated to remove the Core Activity Areas from Hawick and Stow and reduce the Core Activity Area in Galashiels to exclude Channel Street and Douglas Bridge.</p> <p>It is also recommended that additional flexibility of uses is incorporated into Policy ED4 in line with the Town Centre Core</p>

				Activity Area Pilot Study. However, as the Core Activity Areas for Kelso, Melrose and Peebles continue to perform at a high level, there is a more limited flexibility of uses
Economic Development	Policy ED6 Digital Connectivity	This must be given the highest priority to encourage business to the area. <b>(289)</b>	Comments noted. The Local Development Plan will continue to promote high standards of digital connectivity.	No action required.
Economic Development	Policy ED6 Digital Connectivity	There is a general need and demand for substantial improvement to Wi-Fi – to promote and support modern business. <b>(305)</b>	Comments noted. The Local Development Plan will continue to promote high standards of digital connectivity.	No action required.
Economic Development	Policy ED7 Business, Tourism and Leisure Development in the Countryside	<p>SEPA (119) 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 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</p>	<p>Comments noted.</p> <p>In respect to balancing the economic and environmental considerations, paragraph 28 of Scottish Planning Policy states that the “<i>planning system should support economically, environmentally and socially sustainable places by enabling development that balance the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place; it is not to allow development at any cost</i>”. It is not considered that the policy will result in an overly economic focus, rather it will contribute to meeting the principle of “<i>giving due weight to net economic benefit</i>” as required by</p>	It is recommended that the policy is substantially retained. However, it is also recommended that Local Development Plan Policy ED10 Protection of Prime Quality Agricultural Land and Carbon Rich Soils is included in the list of those policies cross referenced; and that additional wording making reference to “ <i>other current strategies</i> ”

		<p>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.</p> <p><b>(119, 199, 213, 305)</b></p>	<p>Scottish Planning Policy (refer to paragraph 29). It should be noted that section 'e' of the Policy in the current LDP stipulates that the proposed development "<i>meets all other siting, and design criteria in accordance with Policy PMD2</i>". Policy PMD2 Quality Standards includes reference to sustainability, placemaking and design, accessibility, and to green space, open space and biodiversity. In addition, Policy ED7 and all other policies contained within the Local Development Plan are required to be read against Policy PMD1 Sustainability.</p> <p>Support from contributor 199 in respect to the cross-referencing of the Woodland Strategy is noted.</p> <p>Comments from contributor 213 regarding the need for careful consideration to important natural heritage resources such as carbon rich and peat soils are noted, and it is recommended that the cross-reference to Policy ED10 Protection of Prime Quality Agricultural Land and Carbon Rich Soils is made. With regards to the suggested reference to the Scottish Borders Cycle Tourism Strategy 2016-2021, it should be noted that it is anticipated that the new Local Development Plan will be formally</p>	<p><i>or any others which are produced within the Plan period that are relevant will also apply</i>" to be inserted in the introductory text of the policy. Furthermore, it is also recommended that the policy confirms the requirement for the inclusion of business and marketing plans to be submitted in support of any relevant planning application.</p>
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			<p>adopted in 2021 and the suggested document may at that time have been superseded. However, it should be noted that additional wording making reference to “<i>other current strategies or any others which are produced within the Plan period that are relevant will also apply</i>” to be inserted in the introductory text of the policy. In addition, it should also be noted that the Tourism Strategy and Action Plan is all encompassing, in that it includes elements from other relevant strategies such as the Cycle Tourism Strategy. Furthermore it should be noted that the Scottish Borders Tourism Strategy is in the process of being reviewed.</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>Support noted.</p> <p>Support noted.</p> <p>Comments noted. However, following further consideration it is not considered appropriate to retitle the policy, as caravan and camping sites adequately encompasses the types of development that would be considered against this policy. It should be noted that some types of caravans are often referred to as</p>	<p>It is recommended that the policy is substantially retained with emphasis on the need to ensure that any new caravan or camping site is of the highest quality and in keeping with their local environment; in addition it is proposed that a requirement for a Business Plan is required to support</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. <b>(119, 213, 214, 305)</b></p>	<p>lodges/chalets but are still legally defined as a caravan under the Caravan Sites and Control of Development Act 1960, and supplemented by section 13 of the Caravan Sites Act 1968. In respect to the suggestion to include reference to Glamping Pods, it is considered that these are a form of camping and so are already covered by this policy.</p> <p>Comments noted. This is an issue that is dealt with by the Development Management section through the processing of any relevant planning application. It should be noted, that the applicant for any new caravan or camping site would be required to show that the application is for genuine tourism/holiday purposes only. To assist with this process, the Council will seek that new or extended caravan and camping sites are supported by a Business Plan. In addition, a planning condition would normally be imposed on any subsequent planning approval, thereby ensuring that the unit is not occupied throughout the year or used as a permanent residence.</p>	<p>any proposal for a new or extended caravan and camping site.</p>
Economic Development	Policy ED9 Renewable Energy Developments	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 support their implementation.”	The Council is aware of the requirement to identify heat networks, heat storage and energy centres and proposes further exploration and work on this matter	Policy EP12 Green Networks has been cross referenced within policy ED9. The Council will

		<p>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 <b>(213)</b></p> <p>Support for district heating schemes is to be welcomed <b>(315)</b></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 <b>(99)</b></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.</p>	<p>is carried out. Some work has been carried out on this to date but getting definitive guidance on how to conclude and implement this is a challenge at this point in time. Policy EP12 Green Networks has been cross referenced within policy ED9</p> <p>Support noted</p> <p>It is considered that the Council's Supplementary Planning Guidance on Renewable Energy 2018 sufficiently references the matters referred to and how they should be addressed at the planning application stage</p> <p>The construction of low carbon distribution and district heating networks require further investigation by the Council. Some work has been done on this but it</p>	<p>continue to development work on heat networks, heat storage and energy centres.</p> <p>No action required</p> <p>No action required</p> <p>The Council will continue to development work on matters such as heat networks, heat</p>
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		<p>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. We <b>require</b> 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 <b>require</b> 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,</p>	<p>has not been concluded and finding definitive guidance on this subject and how it will be delivered is challenging. It is not considered a policy can categorically be stated as suggested by SEPA without absolute clarity and full understanding of how this can be delivered. In essence if it is not, then an application would be refused as SEPA seem to be suggesting, but in order to take that position the Council must be absolutely clear on how this can be done. One of the challenges for the Scottish Borders is that the relatively small scale nature of development proposals make profit margins and feasibility studies for the likes of district heating very challenging. It is noted SEPA suggest this should be a requirement for a new town or sizeable development. SEPA acknowledge such proposals may not occur regularly and the reality is which SEPA acknowledge is that developments of these scales will not happen within the Plan period. It is envisaged the Council's newly set up Sustainable Development Committee which seeks to ensure a corporate approach is taken to embedding development within its strategies, policies and service can help develop how the Council's promotes heat networks.</p>	<p>storage and energy centres.</p>
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		<p>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 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</p>		
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		<p>include heat policies that support the implementation of this approach <b>(119)</b></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 <b>(196)</b></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"> <li>- 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.</li> <li>-Specific reference to support for repowering existing windfarm locations such as the Toddleburn and Clyde Wind Farms.</li> <li>-Identifying existing windfarm locations on LDP proposals map.</li> <li>-Including reference to the acceptance of windfarm developments.</li> <li>-The provision for and policy support for offshore grid connections, including grid cabling, associated substations and ancillary equipment.</li> </ul>	<p>Policy ED9 makes clear reference to the support for a wide range of renewable energy types which is reflected in the Council's SPG on Renewable Energy 2018. However, there is no doubt the most challenged and contentious renewable energy type is wind farms and it is considered appropriate that planning policy should give considerable reference to this</p> <p>It is considered policy ED9 Renewable Energy Developments and the Council's SPG on Renewable Energy give correct and reference to the matters raised, including the support for renewable energy in appropriate locations. The Ironside Farrar study was part of the SPG and therefore forms part of the development plan. Whilst it is a very useful starting guidance point its role and value must not be diminished. Any Environmental Impact Assessment and supporting planning documentation will always be taken on board as part of any planning application proposals</p>	<p>No action required</p> <p>No action required</p>
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		<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> <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. <b>(322)</b></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</p>	<p>Comments and support noted. The introductory text to policy ED10 has been amended in para 1.3 to incorporate the need to make ref to SEPA's Development Plan Guidance notes (Soils)</p>	<p>The introductory text to policy ED10 has been amended in para 1.3 to incorporate the need to make ref to SEPA's Development Plan Guidance notes</p>

		<p>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 <b>(119)</b></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 <b>(318)</b></p>		<p>(Soils)</p> <p>No further action</p>
Economic Development	Policy ED11 Safeguarding of Mineral Deposits	SEPA support the retention of this policy <b>(119)</b>	Support noted	Policy ED11 to be retained
Economic Development	Policy ED12 Mineral and Coal Extraction	<p>SEPA support the retention of this policy <b>(119)</b></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.” <b>(213)</b></p>	<p>Support noted</p> <p>Comments noted. Text can be added to Policy ED12 as requested by SEPA, to address this point. Please note that the matter is not logically included as a specific criterion within the list of situations in which minerals extraction will not be permitted. As such, the text would need to be a free-standing point, albeit within the policy itself, as SEPA is seeking.</p>	<p>No further action</p> <p>Text can be added to Policy ED12 stating: “There will be a presumption against peat extraction and other development likely to have an adverse effect on peatland and/ or carbon rich soils</p>

				within Class 1 and Class 2 peatland areas.”
Housing Development	Policy HD1 Affordable and Special Needs Housing	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. <b>(305)</b>	<p>Comments are noted.</p> <p>The Local Plan does not allocate housing specifically for affordable units. However the Council continues to support the delivery of both affordable housing and housing for particular needs throughout the Scottish Borders through the policies proposed within the Proposed LDP.</p> <p>As part of the Proposed LDP, it is proposed to update the title of Policy HD1 to relate solely to affordable housing delivery, with a new Policy HD6 specifically for housing for particular needs. Policy HD1 aims to ensure that new housing development provides an appropriate range and choice of ‘affordable’ units as well as mainstream market housing. The aim of Policy HD6 is to ensure the provision of housing for particular needs throughout the Scottish Borders.</p>	<p>It is recommended that the existing Policy HD1 is updated to relate solely to affordable housing delivery, with the policy itself substantially retained.</p> <p>It is recommended that a new Policy HD6 is included within the Proposed Plan, which covers housing for particular needs.</p>
Housing Development	Policy HD1 Affordable and Special Needs Housing	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	<p>Comments are noted.</p> <p>As part of the Proposed LDP, it is proposed to update the title of Policy HD1 to relate solely to affordable housing delivery, with a new Policy HD6 specifically on housing for</p>	It is recommended that the existing Policy HD1 is updated to relate solely to affordable housing delivery, with the policy itself

		verification and challenge by Officers. <b>(318)</b>	<p>particular needs. Policy HD1 aims to ensure that new housing development provides an appropriate range and choice of 'affordable' units as well as mainstream market housing. Policy HD1 requires the provision of a proportion of land for affordable housing, currently set at 25%, both on allocated and windfall sites.</p> <p>The aim of Policy HD6 is to ensure the provision of housing for particular needs throughout the Scottish Borders.</p> <p>It should be noted that decision making on affordable housing is guided by both Policy HD1 and the Council's Supplementary Planning Guidance on Affordable Housing.</p>	<p>substantially retained.</p> <p>It is recommended that a new Policy HD6 is included within the Proposed Plan, which covers housing for particular needs.</p>
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. <b>(196)</b>	<p>Comments are noted.</p> <p>The Proposed Policy HD1: Affordable Housing Delivery, aims to ensure that new housing development provides an appropriate range and choice of 'affordable' units as well as mainstream market housing. It is proposed to update the title of Policy HD1 to relate solely to affordable housing delivery, with a new Policy HD6 specifically on housing for particular needs.</p> <p>Policy HD2: Housing in the</p>	<p>It is recommended that the existing Policy HD1 is updated to relate solely to affordable housing delivery, with the policy itself substantially retained.</p> <p>It is recommended that a new Policy HD6 is included within the Proposed Plan, which covers housing for</p>

			<p>Countryside, aims to encourage a sustainable pattern of development focused on defined settlements in accordance with the need to support existing services and facilities and to promote sustainable travel patterns. The policy supports appropriate housing which includes additions to existing building groups, conversions, restorations, replacement housing and housing with an economic justification. It is considered that Policy HD2 supports appropriate and sustainable housing within the Borders countryside, which comply with the criteria contained within the policy. Minor changes to Policy HD2 are included within the Proposed LDP. It should also be noted that a greater emphasis has been included within the policy, specifically to high quality design in all developments.</p> <p>Therefore, it is considered that Policy HD2 provides the opportunity for single houses within countryside locations, which comply with the specific criteria set out within the policy.</p>	<p>particular needs.</p> <p>It is recommended that Policy HD2 is updated to include the changes to sections d) and e), along with making reference to the importance of high quality design within the policy.</p>
Housing Development	Policy HD2 Housing in the Countryside	The contributor states that they do not agree with the preferred option outlined for the housing in the countryside policy. <b>(195)</b>	<p>Comments are noted. The response to Question 8 sets out the reasons for any changes to Policy HD2 within the Proposed LDP.</p>	<p>It is recommended that Policy HD2 is updated to include the changes to sections d) and e), along with making reference to the</p>
Housing Development	Policy HD2 Housing in the Countryside	The contributor does not support the preferred option for housing in the countryside but supports the alternative proposal. <b>(315)</b>		
Housing	Policy HD2	SEPA advise that they support the retention of		

Development	Housing in the Countryside	this policy. <b>(119)</b>		importance of high quality design within the policy.
Housing Development	Policy HD2 Housing in the Countryside	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. <b>(213)</b>		
Housing Development	Policy HD2 Housing in the Countryside	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. <b>(318)</b>		
Housing Development	Policy HD3 Protection of Residential Amenity	<p>The contributor supports the expansion of this policy. <b>(119)</b></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. <b>(318)</b></p>	Comments noted. The additional reference to renewable energy developments within the policy is in addition to the other criteria listed within the policy.	It is recommended that the policy is substantially retained. A reference stating that the policy also applies to applications for renewable energy developments will be included. A cross reference to Policy ED9 'Renewable Energy Development' will also be included at the end of the policy.
Housing Development	Policy HD4 Meeting the Housing Land Requirement/ Further Housing Land	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	<p>Comments are noted from SEPA.</p> <p>The MIR was prepared based upon the housing land requirements set out within the SESPlan Proposed Plan, which was derived from the</p>	It is recommended that the policy is substantially retained, with minor updates to remove the Housing SG



	Safeguarding	<p>Ministers, the statutory policy framework for the LDP 2 is not known. <b>(311)</b></p> <p>SEPA advise that they support the retention and minor amendments to this policy. <b>(119)</b></p>	<p>HNDA 2015. This was in accordance with the SESPlan Housing Background Paper (October 2016), which set out the background, process and justification for the housing supply targets and housing land requirements.</p> <p>The comments regarding the status of SESPlan 2 are acknowledged. The current SDP was approved in June 2013. However, the proposed SDP which was intended to replace SDP 2013 was rejected by Scottish Ministers on the 16<sup>th</sup> May 2019. QC advice was that, whilst out of date, SDP 2013 remains the approved Strategic Plan and must therefore continue to be referred to. However advice also stated that whilst the proposed SDP was rejected there are elements of the supporting technical papers and documents which helped guide the proposed SDP and incorporate more up to date positions, which should be considered as material considerations. HNDA2 is at present the most up to date and therefore reliable assessment of housing need and demand in the SESPlan area.</p> <p>Appendix 2 of the Proposed Plan and the Housing Technical Note set out the housing land requirement</p>	reference.
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			and contributions towards the requirement for the Scottish Borders. The housing supply target and housing land requirement are informed by the HNDA2.	
Housing Development	Policy HD5 Care and Retirement Homes	<p>Contributor 119 states that they support the retention of this policy.</p> <p>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. <b>(119, 289)</b></p>	<p>Support noted.</p> <p>It is considered that the policy contained within the LDP does provide a clear policy and can support controlled development of this type. The current introduction to the policy sets out that the aim of the policy is to ensure that applications for residential care and retirement homes take account of the identified local need for such facilities and the impact that such uses may have on support services and facilities. However, it is not considered appropriate that the LDP policy should set out the most appropriate method of provision for such facilities such as public or private sector, as it is not considered the LDP is the appropriate mechanism for such detail.</p>	It is recommended the policy is substantially retained.
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	<p>Comments are noted in respect of the Council's LBAP Supplementary Guidance.</p> <p>In respect of Biodiversity net gain, reference has been included within criteria c) of the Proposed Plan, to read as follows; '<i>Compensate to</i></p>	It is recommended that the policy is substantially retained and updated to include reference to both Local Biodiversity Sites and Local

		<p>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. <b>(199)</b></p>	<p><i>ensure no net loss of biodiversity through use of biodiversity offsets and ensure net gain as appropriate</i>.</p> <p>It should be noted that the Proposed Plan includes changing the title to Policy EP3: Local Biodiversity and Geodiversity. The purpose of Policy EP3 is to safeguard and enhance local biodiversity and local geodiversity. Both Local Biodiversity Sites (LBS) and Local Geodiversity Sites (LGS) are included within the Proposed Plan and are set out within the accompanying Technical Notes.</p>	Geodiversity Sites.
Environmental Promotion and Protection	Policy EP4 National Scenic Areas	<p>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. <b>(196)</b></p>	<p>The aim of Policy EP4 is to protect and enhance the scenic qualities of the National Scenic Areas (NSA) within the Scottish Borders, by influencing the nature of development both within and outwith them where the development affects the setting and context of the NSA within the wider landscape.</p> <p>However, it is considered that the economic promotion of the NSA's is outwith the remit of this policy.</p>	It is recommended that the policy is substantially retained.
Environmental Promotion and Protection	Policy EP6 Countryside Around Towns	<p>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. <b>(305)</b></p>	<p>Comments are noted.</p> <p>The aim of Policy EP6 is to ensure that the identified Countryside Around Towns (CAT) area and the high quality living environment it provides is protected and enhanced. The policy aims to prevent</p>	It is recommended that the policy is substantially retained.

			<p>piecemeal development that detracts from the area's outstanding biodiversity, landscape, historical and recreational context. The policy also helps prevent coalescence of individual towns and villages within the area, thereby retaining their individual identity.</p> <p>It should be noted that the Selkirk is located outwith the CAT policy area. Therefore, the area is outwith the remit of this policy.</p>	
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. <b>(10)</b>	<p>Support noted.</p> <p>It should be noted that policy EP7 currently states: "<i>The demolition of a Listed Building will not be permitted unless there are overriding environmental, economic, social or practical reasons. It must be satisfactorily demonstrated that every effort has been made to continue the present use or to find a suitable new use</i>". It is therefore considered that the policy does allow for those rare occasions where demolition is required.</p> <p>It should also be noted that it is proposed to amend Policy EP7 Listed Buildings to incorporate additional text in relation to 'Enabling Development'. Enabling Development is supported by Scottish Planning Policy and is a way in which the 'conservation deficit', which exists when the existing value, plus the development</p>	It is recommended that the policy is substantially retained with increased emphasis on the use of Design Statements and reference to be made to enabling development as set out in the MIR.

			cost (e.g. restoration, conversion to an appropriate use and developer profit), exceeds the value of the listed building after development.	
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. <b>(318)</b>	It should be noted that policy EP9 currently states: “ <i>Design Statements will be required for all applications for alterations, extensions, or for demolition and replacement which should explain and illustrate the design principles and design concepts of the proposals</i> ”. In addition, the policy also states: “ <i>The Council will support development proposals within or adjacent to a Conservation Area which are located and designed to preserve or enhance the special architectural or historic character and appearance of the Conservation Area</i> ”. Whilst it is intended that there will be an increased emphasis for the submission of a Design Statement, it is a requirement already set out in policy. Furthermore the Policy also sets out that it will apply to applications within or adjacent to Conservation Areas.	It is recommended that the policy is substantially retained with increased emphasis on the use of Design Statements.
Environmental Promotion and Protection	Policy EP10 Gardens and Designed Landscapes	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 a policy context.	It should be noted that it is considered that the contributor has referred to Annex 3 of the Borders Designed Landscape Survey (i.e. the Peter McGowan study) in error as it is Annex 4 that provides a the policy context, and also provides	It is recommended that the policy is substantially retained with reference to the Borders Designed Landscape Survey

		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. 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. <b>(213)</b>	guidance on management and restoration of these sites. This suggestion is considered to be acceptable and it is therefore proposed to alter the policy introduction accordingly. The contributor also advises that 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, this too is considered an appropriate insertion and the policy introduction will be amended accordingly.	included within the policy introduction, in addition it is also proposed to provide additional wording that differentiates the relative importance of the sites included in the National Inventory of Designed Landscapes in Scotland and those only identified within the Borders Designed Landscape Survey.
Environmental Promotion and Protection	Policy EP11 Protection of Greenspace	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. <b>(254)</b>	Support noted.	It is recommended the policy is substantially retained.
Environmental Promotion and Protection	Policy EP12 Green Networks	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.	Support noted and comments noted.	It is recommended the policy is substantially retained.

		<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. <b>(119, 254, 288)</b></p>	<p>Support noted.</p> <p>It should be noted that LDP Policy EP12 aims to safeguard the Green Network which includes the routes of former railway lines. Chapter 2 para 2.13 makes reference to the potential reinstatement of St Boswells to Berwick line via Kelso</p>	
Environmental Promotion and Protection	Policy EP13 Trees, Woodlands and Hedgerows	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. <b>(305)</b>	<p>Comments are noted.</p> <p>Policy EP3 aims to give protection to the woodland resource and in turn, to the character and amenity of settlements and the countryside, maintain habitats and provide an important recreational asset. The policy seeks to protect and enhance the whole resource, not only individual trees that might be protected by a Tree Preservation Order; safeguarded by a condition on a planning permission; or located within a Conservation Area.</p> <p>It should be noted that the monitoring of air quality and pollution is outwith the remit of this policy.</p>	It is recommended the policy is substantially retained.
Environmental	Policy EP13	The contributor would like to see the wording	Comments are noted.	It is recommended

<p>Promotion and Protection</p>	<p>Trees, Woodlands and Hedgerows</p>	<p>'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.</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 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.</p>	<p>The contributor would like to see additional wording in respect of removal or damage to woodlands present on the Ancient Woodland Inventory, or woodland of high nature conservation value. The aim of the policy is to give protection to the woodland resource and in turn, to the character and amenity of settlements and the countryside, maintain habitats and provide an important recreational asset. The assessment criteria within the policy states that '<i>The Council will refuse development that would cause the loss of or serious damage to the woodland resource unless the public benefits of the development clearly outweigh the loss of landscape, ecological, recreational, historical or shelter value</i>'. Any development that may impact on the woodland resource must meet the criteria contained within the policy. It is considered that the current policy criteria provide adequate protection for the woodlands present on the Ancient Woodland Inventory or woodland of high nature conservation value.</p> <p>In response to the second point, regarding the buffering and extension of ancient woodland sites, this matter is outwith the remit of the policy. It should be noted that Policy</p>	<p>the policy is substantially retained.</p>
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		<b>(199)</b>	EP13 is applicable to all development, not just allocated sites. Likewise, the specific species/planting cannot be specified within the policy itself. This matter would be dealt with through the planning application process and in consultation with the Council's Landscape Officer.	
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. <b>(213)</b>	Comments noted. It is acknowledged that Scottish Borders Council should work to ensure coherence with the National Marine Plan (NMP). It is considered appropriate to update the policy to ensure the required complementary policies and practices are in place.	It is recommended the policy is substantially retained. A new paragraph is to be inserted into the introductory text to ensure the required complementary policies and practices are in place. The policy should also be updated to include a reference to Circular 1/2015: The Relationship Between the Statutory Land Use Planning System and Marine Planning and Licensing.
Environmental Promotion and Protection	Policy EP15 Development Affecting the	The contributor supports the inclusion of this policy. The contributor welcomes the retention of this policy as it provides good coverage of the	Support noted.	It is recommended the policy is substantially

	Water Environment	'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. <b>(119)</b>		retained.
Environmental Promotion and Protection	Policy EP16 Air Quality	<p>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. <b>(119)</b></p> <p>The contributor considers it very odd that so little is said about encouraging renewable energy - and yet the potential negative impact of wood-</p>	<p>Support and comments noted. The existing policy text makes reference to the cumulative effect of development proposals and the impacts of this. It is considered appropriate to add the following paragraph to the introductory text to make reference to the cumulative impact of traffic:</p> <p><i>'The Council acknowledges 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'.</i></p> <p>Comments noted. Policy guidance in relation to renewable energy is included within 'Policy ED9</p>	It is recommended that the introductory text of the policy is updated to make reference to specific legislation and strategies in relation to air quality. It is also recommended to add a reference to the cumulative impact of traffic associated with new developments.

		<p>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. <b>(196)</b></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. <b>(215)</b></p>	<p>Renewable Energy Development' and the Council's Renewable Energy Supplementary Guidance. It is not intended that the policy will state that low carbon/renewables have a detrimental impact</p> <p>Comments noted. It is not considered appropriate to detail each development where air quality control may be an issue within this policy. It is felt that this issue is sufficiently covered within the existing policy wording.</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. <b>(147)</b></p> <p>SEPA support the retention of this policy. <b>(119)</b></p>	<p>Through the process of the allocation of sites, the NHS, the Council's Education Department and Roads Sections (including Passenger Transport, Network Management and Roads Planning) as well as Transport Scotland are all involved in confirming the suitability of sites or otherwise. Policy IS1 – Public Infrastructure and Local Service Provision would be referred to, where applicable, during the process of planning applications.</p>	No action required.
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</p>	<p>Comments noted.</p> <p>It should be noted that the Roads Planning section are of the view that improved traffic connectivity is required for the development of the allocated sites (MPEEB006) and (APEEB044).</p>	No further action required.

		<p>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.</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. <b>(126)</b></p>	<p>In addition, in respect to a new proposed site at Land South of Chapelhill Farm (APEEB056) the Roads Planning section have stated: <i>“Any development at the north end of Peebles will be reliant upon improved vehicular linkage being provided over the Eddleston Water between Rosetta Road and the A703. This should ideally be provided between Kingsland Square and Dalatho Street, but there may be other acceptable opportunities further north. Third party land ownership will be an issue. ... Some minor road improvement work may be required to Rosetta Road leading to the site from the town to facilitate the flow of traffic and the existing public road through the site will likely need to be modified to accommodate the development. A Transport Assessment would be required to identify and address transport impacts and to demonstrate sustainable travel is achievable”</i>.</p> <p>As a result of the above, a site requirement for site (APEEB056) is included within the Proposed Plan stating that the above improved connectivity will be required. This therefore, will allow for developers/landowners to work together and enable the sharing of costs in resolving the requirement of</p>	
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			improved connectivity.	
Infrastructure and Standards	Policy IS2 Developer Contributions	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. <b>(119)</b>	Comments are noted.  It should be noted that an additional criteria h) has been included within the policy criteria to read; ' <i>Flood protection schemes, where the site would benefit from its implementation</i> '.	It is recommended that the policy is substantially retained with minor changes.
Infrastructure and Standards	Policy IS2 Developer Contributions and IS3 Developer Contributions Related to the Borders Railway	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) that subsidy to public transport provides a valuable form of contribution. <b>(294)</b>	Comments are noted.	It is recommended that Policy IS2 & IS3 are substantially retained with minor changes.
Infrastructure and Standards	Policy IS4 Transport Development and Infrastructure	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. <b>(305)</b>	Comments noted. The Local Development Plan continues to safeguard the line of the proposed Selkirk bypass, however, there is currently no Scottish Government commitment and further studies would be required to identify the exact line and establish community and environmental impacts.	No action required.
Infrastructure and Standards	Policy IS4 Transport Development and Infrastructure	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	Comments noted.	No action required.

		<p>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. <b>(294)</b></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. <b>(100)</b></p> <p>SEPA welcomes the framework provided by this policy, and are pleased to note that the policy is</p>	<p>Comments noted. The Council will continue to consult with Northumberland County Council (NCC) of the Local Development Plan. Development Management and the Flood and Coastal Management team would determine the need to notify NCC on a case by case basis.</p> <p>The Council is content that Policy IS8 - Flooding within the current</p>	No action required.

		<p>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 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.</p> <p>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 <a href="#">Land Use Vulnerability</a></p>	<p>LDP 2016 and the Proposed LDP works in practice. The Council will continue to consult with SEPA during the process of planning applications and will determine each application on a case by case basis.</p> <p>The policy states ‘generally’ which is considered to be in line with SEPA guidance. As stated above, the Council will continue to consult with SEPA during the process of planning applications and will determine each application on a case by case basis.</p>	
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		<p><a href="#">Guidance</a> 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</p>		
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		<p>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.</p> <p>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 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</p>	<p>The latest climate change guidance, which is continually evolving, will be taken into account at that time. The Council will continue to liaise with SEPA on developments.</p>	
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		<p>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". <b>(119)</b></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</p>	<p>The Council will continue to liaise with the Flood Risk and Coastal Management Team and SEPA on development proposals.</p>	
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		<p>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. <b>(182)</b></p>		
<p>Infrastructure and Standards</p>	<p>Policy IS9 Waste Water Treatment Standards and Sustainable Urban Drainage</p>	<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 Planning 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"> <li>• is more than 4 hectares,</li> <li>• is in excess of 5km, or</li> <li>• includes an area of more than 1 hectare or length of more than 500m on ground with a slope in excess of 25°</li> </ul> <p>The contributor states that SEPA's <a href="#">Sector Specific Guidance: Construction Sites (WAT-SG-75)</a> provide 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</p>	<p>Support and comments noted. It is considered acceptable that the policy will include a reference to the Supplementary Planning Guidance on SUDS which is being produced by the Council. The policy will also make reference to the benefits associated with SUDS.</p> <p>It is not felt necessary to include a reference to the requirement for Controlled Activities Regulations (CAR) construction site licences for the management of surface water run-off from construction sites within the introductory text of the policy. It is felt that this details the procedures and requirements of SEPA and it is not felt that the Local Development Plan is the vehicle for this.</p>	<p>It is recommended the policy includes a reference to the Supplementary Planning Guidance on SUDS. The policy will also make reference to the benefits associated with SUDS.</p>

		engagement discussions with the SEPA regulatory teams. <b>(119)</b>		
Infrastructure and Standards	Policy IS10 Waste Management Facilities	<p>The contributor supports the retention of this policy. <b>(119)</b></p> <p>The SBC recycling policy is woefully inadequate as most plastics are single use. This requires joined up work with manufacturers. <b>(223)</b></p>	<p>Support noted.</p> <p>This would not be a matter for the Local Development Plan. The Waste Management team advises that the Council collects a range of plastics as part of its kerbside collection service (<a href="https://www.scotborders.gov.uk/info/20001/bins_rubbish_and_recycling/464/what_goes_in_each_bin_or_bag">https://www.scotborders.gov.uk/info/20001/bins_rubbish_and_recycling/464/what_goes_in_each_bin_or_bag</a>). The single use plastics issue is complex and spans many different sectors including; designers, manufacturers, retailers, consumers, national government, public and private sector waste organisations etc. The Council is near the end of this chain and has limited ability on its own to impact change. That said the Council has recently set up a Committee to consider Sustainability and there is no doubt that single use plastics will be one of many areas for consideration. The UK Government, in partnership with the Scottish and Welsh Governments, is reviewing the Extended Producer Responsibilities. A consultation was issued early in 2019 on the subject and the findings are currently being reviewed. The general idea is to require producers and</p>	No action required.

			manufacturers to use recycled materials in their products and make products easier to recycle through a taxation system. It was also considering requiring producers to fund local authorities to collect and recycle waste which is not the case at the moment. This has the potential to have a massive impact on single use plastics.	
Infrastructure and Standards	Policy IS11 Hazardous Developments	The contributor supports the retention of this policy. <b>(119)</b>	Support noted.	It is recommended the policy is substantially retained.
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>Comments noted. It is acknowledged that the main focus of Policy IS13 is contaminated land however, the policy does include reference to unstable land. It is therefore considered appropriate that the policy title be updated to reflect this as suggested by the contributor.</p> <p>Comments noted. The existing text within paragraph 1.1 makes reference as to when SNH should be consulted. It should be noted that there are additional key stakeholders that may need to be consulted depending on the proposal however this is not currently referred to. It is acknowledged that it would be helpful to provide developers with additional guidance however it is not considered appropriate to include a</p>	<p>It is recommended that the policy be renamed ‘<i>Policy IS13 Contaminated and Unstable Land</i>’.</p> <p>It is also recommended that the following text is added to paragraph 1.1 to make reference to other key consultees:</p> <p><i>‘It should be noted, Scottish Natural Heritage (SNH) only require to be consulted by developers preparing their assessments</i></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> <ul style="list-style-type: none"> <li>a) carry out, in full consultation with, and to the satisfaction of Scottish Borders Council, appropriate phased site investigations and risk assessments; and</li> <li>b) 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. <b>(79)</b></li> </ul> <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 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: <a href="https://www.nature.scot/professional-advice/planning-and-development/consulting-snh-planning-and-development">https://www.nature.scot/professional-advice/planning-and-development/consulting-snh-planning-and-development</a> <b>(213)</b></p>	<p>hyperlink within the policy as these often change or become outdated thereby rendering the hyperlink unusable. It is considered more appropriate to add the following text to the end of paragraph 1.1 to make reference to other key consultees. <i>'It should be noted, Scottish Natural Heritage (SNH) only require to be consulted by developers preparing their assessments where there are potential impacts on sites designated for their natural heritage value. Other appropriate public bodies may also be consulted and this will be determined on a case by case basis'</i>.</p>	<p><i>where there are potential impacts on sites designated for their natural heritage value. Other appropriate public bodies may also be consulted and this will be determined on a case by case basis'</i>.</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</p>	<p>Support and comments noted. It is considered acceptable for the Council to engage with SEPA with regards to the proposed wording of the new policy. It should be noted that it is intended that the new policy will make reference to relevant SEPA Guidance.</p>	<p>It is recommended to include a new policy on Cemetery Provision within the Plan. It is proposed that the new policy will include reference to SEPA guidance as well as a</p>

		<p>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 <a href="#">Guidance on Assessing the Impacts of Cemeteries on Groundwater</a> 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. <b>(119, 213)</b></p>	<p>Support and comments noted. It is considered acceptable that the proposed new policy will allow for new or extended 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.</p>	<p>requirement to design in natural features that are beneficial to visitors for their aesthetic properties and to biodiversity for their role in wider green networks.</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). <b>(93)</b></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 <b>(116)</b></p>	<p>The following comments relate to all the representations made within this section on the provision of a new dark sky policy.</p> <p>The Council is aware of the project to designate a considerably large part of the Region, the final area to be agreed, as a dark skies area. Once this is designated the Council will produce a Supplementary Guidance on this subject. It is not</p>	<p>If the dark skies area is designated the Council will produce a Supplementary Planning Guidance confirming the designated area and a planning policy for dealing with planning applications which</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 <b>(153)</b></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! <b>(305)</b></p> <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 <b>(96)</b></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 &amp; 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</p>	<p>considered correct procedure to draw up a policy within this LDP without fully appreciating and understanding the controls and issues this must address as well as not knowing the geographical area it refers to. Whilst there appears general support for the project (significantly in Newcastleton CC area) it is correct procedure that the SPG on planning policy re dark skies is prepared as a draft document for public scrutiny and comment in order that all interested parties have the opportunity to fully understand what the designation means in practice from a planning policy point of view and what the requirements and any implications are for affected parties. The Council is not in a position to confirm the full implications of the project as yet and clearly much more work and clarity requires to be investigated regarding this matter. The efforts of Newcastleton CC to promote and designate a dark sky area is acknowledged</p>	<p>propose lighting within the designation</p>
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		<p>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 <b>(213)</b></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".<b>(287)</b></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 &amp; 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</p>		
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		<p>useable questionnaires representing 305 individuals were returned.</p> <p>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"> <li>• We want to see more done to ensure that our community and surrounds are protected and awarded Dark Sky status.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p>The survey concluded 98% of those who voted supported the Dark Sky status. <b>(307)</b></p>		
General	Land Use Strategy	<p>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. <b>(236)</b></p>	<p>Comments are noted.</p> <p>The Council has produced a Land Use Strategy (LUS). The aim of the framework was to test the principles of the National LUS at a local level to see how they can be realised in a practical way. This was based on an ecosystem approach that may guide decisions that help integrate land management that could make best use of the land.</p>	No action required.

			<p>It should be noted that the Council continue to promote the LUS and reference has been included within Policy EP3: Local Biodiversity and Geodiversity, to the Land Use Strategy.</p>	
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## 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.

## 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.

Main Issue	Sub Issue	Summary of Main Issues Raised	Proposed Response to Main Issues Raised	Recommendation
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. <b>(73)</b>	The reference is made to the Foreword within the Main Issues Report as opposed to the proposed Local Development Plan. It is considered that throughout the LDP policy references and allocations confirm the efforts to allow new growth and investment and support economic benefits, e.g. business / housing / mixed use / redevelopment allocations, funding opportunities via SOSEP / Borderlands, more flexibility to town centre policies, etc	No further action required
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. <b>(73)</b>	The Planning Process is an open and transparent process. Decisions regarding any new Local Development Plan (LDP) are taken at Council level. A summary of all responses received are presented to the Council along with any subsequent recommendations. Full copies of all the submissions are also available for members to view. Furthermore it should be noted that a redacted copy of all submissions were posted online at: <a href="https://www.scotborders.gov.uk/info/20051/plans_and_guidance/924/main_issues_report_-_consultation_responses">https://www.scotborders.gov.uk/info/20051/plans_and_guidance/924/main_issues_report_-_consultation_responses</a>	No further action required.

			<p>The Scottish Government sets out guidance on how the community can effectively engage in the planning process in Planning Advice Note 3/2010: Community Engagement. Early engagement is defined as being the LDP Main Issues Report (MIR) stage. However, proposals have been developed to extend engagement proposals beyond the PAN's minimum requirement. Scottish Borders Council has in the past extensively consulted throughout the Local Development Plan Process and intend to do this again within the Local Development Plan 2 process.</p> <p>The next opportunity for all interested parties to contribute to the Local Development Plan process is at the Deposit stage of the Proposed Local Development Plan.</p>	
Any other comments: Question 19	Statistical Analysis	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? <b>(73)</b>	Housing land supply allocations are calculated on matters on historical housing land take up and the existing housing land supply which includes parts of allocations which are currently constrained. Even if a settlement had no projected population increase this would not mean there would be no demand nor requirement for new housing. There are various reasons why for new build e.g. parties wishing to up size,	No action required

		<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? <b>(73)</b></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? <b>(73)</b></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</p>	<p>down size, desire a new house, the need for affordable units, demolitions reduce the land supply etc</p> <p>The projected cost for meeting the needs of the ageing population is outwith the remit and controls of the planning system. The LDP has put in place policies which can allow the support of elderly accommodation when planning applications are submitted</p> <p>Forecasting business / industrial development demand is difficult. Consideration for allocating such land is dependent on a no of factors including records of land take up and enquires to the Council. In Tweedbank for example there have been several applications recently for business developments which have taken up part of the land supply. Should interested parties contact the Council seeking land for business purposes the LDP must attempt to ensure adequate provision. It is considered the business / industrial land allocated within the LDP is sufficient over the LDP period.</p> <p>The planning system and the LDP can allocate land for such uses and supports a wide range of innovative uses. However, other factors</p>	<p>No action required</p> <p>No action required</p> <p>No action required</p>
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		technologies and businesses which can stimulate the community, attract new enterprise and maintain a stable/ vibrant population. <b>(305)</b>	outwith the LDP's remit can influence land take up. For example, seeking funding to ensure sites are fully serviced for us of any interested parties is often a challenge although it is envisaged, for example, SOSEP can help achieve this.	
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. <b>(73)</b>	There is no doubt that rural businesses have faced continuing challenges and this is likely to be impacted further due to Brexit, particularly for farmers and landowners due to a reduction in subsidies. It is not suggested that rural business are suffering worse than other sectors.	No action required
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. <b>(73)</b>	This is a substantial piece of work being requested which is not best use of staff time and of little practical benefit given that throughout the LDP reference is given where necessary to national planning requirements and how these are addressed	No action required
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. <b>(23)</b>  The LDP favours developing on greenfield and agricultural sites rather than brownfield. Brownfield should always be prioritised. <b>(80)</b>	It should be noted that the Council is required to have an effective five year housing land supply at all times. Often brownfield sites have constraints that prevent their development from taking place. Paragraph 119 of the Scottish Planning Policy (SPP) states "... <i>In allocating sites, planning authorities should be confident that land can be</i>	No further action required.



			<p><i>brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met</i>".</p> <p>Whilst it is noted that previously developed brownfield land in built-up areas must continue to play a vital role for a range of purposes including housing. It is important that all developments, be they on brownfield or greenfield, are in the right place, in the right scale, with the right infrastructure.</p> <p>The supporting text of LDP Policy ED5: Regeneration within paragraph 1.2 states "<i>The Local Development Plan allocates redevelopment opportunities across the Borders, although these allocations are not exhaustive</i>". The policy also clearly states it also relates to non-allocated brownfield sites. Opportunities within development boundaries not identified within the policy can still be considered against policy PMD5 Infill Development. The policy states development on non-allocated, infill or windfall sites including the re-use of buildings within Development Boundaries as shown on proposals maps will be approved where policy criteria are satisfied. Policy ED5 clearly states that development on allocated and non-allocated brownfield sites will be approved in</p>	
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			all cases where the policy criteria are satisfied. The regeneration policy identifies key areas and projects for redevelopment; the aim of the policy is to encourage redevelopment of brownfield sites within the Borders on appropriate allocated and non-allocated sites..	
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</p>	<p>Comments are noted.</p> <p>The MIR was prepared based upon the housing land requirement set out within the SESPlan Proposed Plan, which was derived from the HNDA 2015. This was in accordance with the SESPlan Housing Background Paper (October 2016), which set out the background, process and justification for the housing supply targets and housing land requirements.</p> <p>The comments regarding the status of SESPlan 2 are acknowledged. The current SDP was approved in June 2013. However, the proposed SDP which was intended to replace SDP 2013 was rejected by Scottish Ministers on the 16<sup>th</sup> May 2019. QC advice was that, whilst out of date, SDP 2013 remains the approved Strategic Plan and must therefore continue to be referred to. However advice also stated that whilst the proposed SDP was rejected there are elements of the supporting technical papers and documents</p>	No action required.

		<p>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. <b>(306)</b></p>	<p>which helped guide the proposed SDP and incorporate more up to date positions, which should be considered as material considerations. HNDA2 is at present the most up to date and therefore reliable assessment of housing need and demand in the SESPlan area.</p> <p>Appendix 2 of the Proposed Plan and the Housing Technical Note set out the housing land requirement and contributions towards the requirement for the Scottish Borders. The housing supply target and housing land requirement are informed by the HNDA2.</p> <p>It should be noted that the MIR will not be updated. The next stage in the process will be the public consultation on the Proposed LDP2. Details of the consultation process will be available on the Council's website.</p>	
Any other comments: Question 19	Plan Period (LDP and SDP)	<p><u>LDP</u> The contributor does not dispute the expected year of adoption or the 10 year period (2021/22 – 2030/31) 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</p>	<p>Comments are noted in respect of potential delays as a result of SESPlan 2.</p> <p>The Development Plan Scheme (DPS) is updated annually which includes the Council's timescales for delivering the LDP. It should be noted that the intended year of adoption for the Proposed LDP2 remains 2021. However, it is acknowledged that for example the</p>	No action required.

		<p>the LDP would have to be amended to 2022/23-2031/32. <b>(306)</b></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. <b>(306)</b></p>	<p>Examination process is outwith the control of the Local Authority.</p> <p>Comments are noted in respect of the SDP. The MIR was prepared based upon the housing land requirements set out within the SESPlan Proposed Plan, which was derived from the HND A 2015. This was in accordance with the SESPlan Housing Background Paper (October 2016), which set out the background, process and justification for the housing supply targets and housing land requirements.</p> <p>The comments regarding the status of SESPlan 2 are acknowledged. The current SDP was approved in June 2013. However, the proposed SDP which was intended to replace SDP 2013 was rejected by Scottish Ministers on the 16<sup>th</sup> May 2019. QC advice was that, whilst out of date, SDP 2013 remains the approved Strategic Plan and must therefore continue to be referred to. However advice also stated that whilst the proposed SDP was rejected there are elements of the supporting technical papers and documents which helped guide the proposed SDP and incorporate more up to date positions, which should be considered as material considerations. HND A2 is at present</p>	
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			<p>the most up to date and therefore reliable assessment of housing need and demand in the SESPlan area.</p> <p>Appendix 2 of the Proposed Plan and the Housing Technical Note set out the housing land requirement and contributions towards the requirement for the Scottish Borders. The housing supply target and housing land requirement are informed by the HNDA2.</p>	
Any other comments: Question 19	Conservation Area - Galashiels	Quite how some of the current area qualifies is unknown and, in any event, doesn't appear to be enforced. Should this be reviewed with Bank Street genuinely conserved? <b>(22)</b>	<p>The Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 requires Local Authorities <i>"from time to time determine which parts of their district are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance"</i>, and to designate such areas. The Galashiels Conservation Area was only recently designated on 5 March 2012. This designation was undertaken in consultation with the local community.</p> <p>The town is focused around the Cornmill Square, the confluence of the three major approach roads. The square, including the Burgh Hall and War Memorial, the Scott and Burns monuments and the fountain itself forming the town centre-piece. The A7 forms the main street, running parallel with Gala Water and following the historic mill lade</p>	It is therefore recommended that the Galashiels Conservation Area is retained as is.

			<p>towards the Cornmill Fountain. The settlement centres on this main thoroughfare, with large public buildings, commercial outlets and retail facilities clustered along the streetline. The variety of building forms and architectural styles identify this urban core, with tall narrow buildings and an eclectic mix of designs, materials and colours. This high density is complemented by the Bank Street Gardens, forming a welcome respite from the vibrant city streets. However, the underlying topography is also evident, with the valley sides encroaching to the south creating a sense of natural intimacy which contrasts with the urban core. Victorian planned development characterises these outer areas, interspersed with large villas and standard tenement units. It is therefore considered that the town is defined by this interaction between the built environment and the natural setting. A number of distinctive landmarks and views define the character of the rural historic settlement.</p> <p>It is therefore considered that the Galashiels Conservation Area meets the criteria for Conservation Area status.</p>	
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	<p>Comments are noted.</p> <p>The sites included within the</p>	No action required.

		<p>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. <b>(152)</b></p>	<p>Proposed Plan are situated in or around existing settlements. In the longer term it may be that ideas come forward for new 'stand alone' settlements in high demand areas. As a result of the complexity of the work involved in preparing the infrastructure and design of any new settlements and that the housing land requirements are satisfied, there are no new settlements included within the Proposed Plan and it is not considered there is any need for a new settlement at this point in time as the LDP has sufficient land for the LDP period. However, the Council is open to well thought through proposals of this kind put forward by developers or landowners so that early consideration can begin.</p>	
<p>Any other comments: Question 19</p>	<p>Hotels - Galashiels</p>	<p>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. <b>(24)</b></p>	<p>Comments noted. A 'Borders Railway Corridor Hotel Market Assessment' was prepared in 2017 by Hotel Solutions for the Borders Railway Blueprint Leaders Group. This was undertaken to understand the potential for hotel development along the Borders Railway Corridor, and the role that this can play in the wider regeneration and inward investment strategy for the corridor which is seeking transformational change with the railway as its catalyst. The Hotel Assessment suggests that the immediate priority for a budget hotel should be</p>	<p>No action required.</p>

			Galashiels. There is a growing argument that the preferable location for a hotel is within Galashiels given the initiative of regenerating the town centre and the wide arrays of facilities that the town centre offers.	
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. <b>(24)</b>	Comments noted. This would be dictated by the market and developers.	No action required.
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. <b>(96)</b>	Comments are noted.  The Proposed LDP2 main aims include 'growing our economy'. The aim states that the LDP2 must provide opportunities for economic growth and job creation. Another aim is 'rural environment' which states that in remote rural locations improved transport modes and the need for first class digital connectivity must continue to be addressed.	No action required.
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. <b>(105)</b>	Comments noted. The Aims of the Plan encourage and support the promotion and protection of new and existing access routes. It should also be noted that the Access and Transport section of the Council continually work at maintaining and enhancing this network. This work is undertaken in collaboration with neighbouring authorities when appropriate.	No further action required.
Any other comments: Question 19	Countryside Around Towns - Melrose/	Melrose and District Community Council consider that the green spaces between Melrose and Darnick must be strongly protected to ensure the	Comments are noted.  Policy EP6: Countryside Around	No action required.



	Darnick	two communities do not become adjoined. <b>(82)</b>	Towns, aims to ensure that the identified Countryside Around Towns (CAT) area and the high quality living environment it provides is protected and enhanced.  The policy will be substantially retained within the Proposed LDP2.	
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. <b>(82)</b>	Comments noted. The reliability/service is a matter for ScotRail.	No action required.
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. <b>(105)</b>	Comments noted. In respect to winter maintenance, further information can be found on the Council's website at: <a href="https://www.scotborders.gov.uk/info/20036/winter_weather/107/gritting_and_grit_bins">https://www.scotborders.gov.uk/info/20036/winter_weather/107/gritting_and_grit_bins</a> In addition, winter maintenance can be contacted online at: <a href="https://www.scotborders.gov.uk/site/xfp/scripts/xfp_form.php?formID=51&amp;language=en">https://www.scotborders.gov.uk/site/xfp/scripts/xfp_form.php?formID=51&amp;language=en</a>	No further action required.
Any other comments: Question 19	Transport	The contributor conveys their support in terms of: <ul style="list-style-type: none"> <li>• the dualling of the A1 and local improvements to the A68 and A7 to improve journey times (section 2.21)</li> <li>• 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)</li> <li>• reference to the Borders Railway being a success in giving improved connection to</li> </ul>	Comments and support noted.	No action required.

		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) <b>(100)</b>		
Any other comments: Question 19	Public Transport	The contributor states that the removal of the subsidy for the bus service beggars belief. <b>(240)</b>	Comments noted. This is not a matter which can be addressed through the Local Development Plan.	No action required.
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.  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.  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.	The control of parking times is outwith the remit of the LDP and is therefore not enforced by planning officers.  The LDP sets out the required parking provision for new build development. The Council carries out and identifies new parking areas for the general public when considered necessary and justified. This can be done without there being a specific allocation for parking identified in the LDP  The Council carries out and identifies new parking areas for the general public when considered necessary and justified. This can be done without there being a specific allocation for parking identified in the LDP. The LDP / planners have no control over the enforcement of car parking	No action required  No action required  No action required

		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. <b>(93, 288, 289, 318)</b>	The Council carries out and identifies new parking areas for the general public when considered necessary and justified. This can be done without there being a specific allocation for parking identified in the LDP.	No action required
Any other comments: Question 19	Development Impact - Scottish Borders	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. <b>(146)</b>	The LDP has policies in place to give protection to designated landscape areas and the rural countryside within the Scottish Borders. However, when dealing with planning applications the planning process must consider issues which often conflict e.g. the support of rural development verses protection of the landscape. It is considered the LDP gives appropriate guidance for dealing with such proposals which can involve a balance of policy weightings.	No action required
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. <b>(145)</b>	Whilst the primary responsibility for operating the development planning system for the Scottish Borders lies with the Council, Circular 6/2013 Development Planning states that all interests should be engaged as early and as fully as possible. In addition that document also states “ <i>key agencies are under a specific duty to co-operate in the preparation of development plans</i> ”; this includes Scottish Natural Heritage, Scottish Environmental Protection Agency, Scottish Water and NHS (Health Board). The Council have consulted	No further action required.

			<p>with all key agencies throughout the Local Development Plan process and will continue to do so. This then allows key agencies to plan according to their needs and demands also. NHS Borders have stated that they will continue to engage with SBC colleagues to provide primary care and public health input to the wider planning process including the creation of the next Scottish Borders Council Local Development Plan early in its preparation cycle as part of a Health in All Policies approach.</p> <p>Scottish Planning Policy requires LDP's to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system. In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that</p>	
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			assessment. In doing this a rigorous site assessment process is used to identify the best sites possible. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, and well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.	
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. <b>(149)</b>	It should be noted that it is not intended that all of the sites identified within the Main Issues Report (MIR) for the Tweeddale Locality will be brought forward for development. In addition, it should also be noted that the Council are required to allocate sufficient land within each of the Strategic Development Areas. Scottish Planning Policy requires LDP's to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system. It is considered the LDP offers a range of site options across the region	No further action required.
Any other comments:	Land Use Strategy	The contributor states that excellent work has already been carried out in Scottish Borders, on	Comments are noted.	No action required.

Question 19		<p>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. <b>(280)</b></p>	<p>The Council has produced a Land Use Strategy (LUS). Policy EP3 makes reference to the Land Use Strategy within the introductory text, stating that, <i>'The Council will adopt an integrated ecosystems approach to ensure sustainable use of land, water and living resources, in accordance with good practice, the Land Use Strategy and Scottish Biodiversity Strategy'</i>.</p> <p>The Council continues to support the LUS and have included reference within Policy EP3: Local Biodiversity Sites and Local Geodiversity Sites.</p> <p>Any further work in relation to the LUS will be available and published on the Council's website.</p>	
Any other comments: Question 19	Forestry	<p>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. <b>(280)</b></p>	<p>The Proposed LDP includes reference to these documents however is not responsible for the production of them. It should be noted that Policy EP3: Local Biodiversity Sites and Local Geodiversity Sites contained within the Proposed LDP, includes reference to the LUS. Furthermore, Policy EP13: Trees, Woodlands and Hedgerows includes reference to the Woodland Strategy.</p> <p>Any progress and development on the LUS and Woodland Strategy will be available on the Council's website.</p>	No action required.

<p>Any other comments: Question 19</p>	<p>Settlement Boundary – Coldingham Sands</p>	<p>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. <b>(327)</b></p>	<p>Comments are noted.</p> <p>Given the rural character and nature of the Scottish Borders, there are a vast number of housing groups within countryside locations. This is characteristic of the Borders countryside.</p> <p>Policy HD2: Housing in the Countryside, as contained within the Proposed Plan, aims to encourage sustainable housing development in appropriate locations within the countryside. High quality design is a requirement for all rural development proposals. The policy sets out criteria for rural housing within the Borders countryside.</p> <p>It is considered that Policy HD2 is the most appropriate mechanism for assessing rural housing development, rather than creating development boundaries around them.</p>	<p>No action required.</p>
<p>Any other comments: Question 19</p>	<p>Infrastructure - Reston</p>	<p>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.</p>	<p>The comments are noted.</p> <p>It is noted that the provision of a new station facility at Reston has been agreed by the Scottish Government and will be provided in the current control period (2019 – 2024).</p> <p>Any development must ensure compliance with the policies contained within the Proposed LDP,</p>	<p>No further action required.</p>

		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. <b>(144)</b>	covering a range of matters including infrastructure.  The comments are noted in respect of the primary school. It should be noted that any allocation for housing is subject to consultation with the Council's Education and Estates Department and they raised no objections to the existing and proposed allocation for housing within the Proposed LDP.	
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). <b>(294)</b>	Comments are noted.	No further action required.
Any other comments: Question 19	Main Issues Report	Contributor 274 states that the document is very good and comprehensive.  Contributor 290 states that the consultation and planning to date has been comprehensive.  Contributor 295 states that the document is a good start and states thank you for the consultation. <b>(274, 290, 295)</b>	Comments noted.	No further action required.
Any other comments: Question 19	Main Issues Report Document - Maps	Contributor 276 states that the scaling of maps is not universal, this is unhelpful and misrepresentative.  Contributor 305 states that it is disappointing that	The Council considers the maps within the Main Issues Report are appropriate and is not aware of other parties being unable to understand them  The Council considers the maps	No further action  No further action



		<p>the settlement maps contained in the document are poor. They give virtually no context and no north point to assist orientation or proper understanding.</p> <p><b>(276, 305)</b></p>	<p>within the Main Issues Report are appropriate and is not aware of other parties being unable to understand them</p>	
<p>Any other comments: Question 19</p>	<p>Process - Consultation with NHS &amp; Education on sites</p>	<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</p>	<p>Whilst the primary responsibility for operating the development planning system in the Scottish Borders lies with the Council, key agencies such as Health Boards and Scottish Water are under a specific duty to co-operate in the preparation of development plans. In advance of the publication of the MIR, key agencies and various departments of the Council (including Education and Roads Planning) were kept informed of the process and consulted on individual sites for consideration. In addition, key agencies were also consulted on the MIR during its formal public consultation period.</p> <p>The Development Planning Circular 2013 states in paragraph 155 that <i>"The intention is that, through this full and early engagement, plan-making authorities will have early access to much of the key information they need to produce effective plans. The plans themselves will therefore be realistic and deliverable and tie in with the strategic objectives of other agencies, with these agencies 'buying-in' to the strategy and</i></p>	<p>No further action required.</p>

		<p>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?</p> <p>In relation to health, Council Officers say that they have had conversations with NHS staff who have said that there is sufficient health care in this</p>	<p><i>proposals of plans and assisting in their delivery”</i>. It is therefore, the responsibility of individual key agencies to organise and plan for their future requirements for the services that they provide.</p> <p>In relation to comments regarding schools and their capacity, it should be noted that occupancy levels at all schools are kept under review by the Council and it should also be noted that they can fluctuate over time. Furthermore it is considered that occupancy figures show only a snapshot in time.</p> <p>It is noted that the Council is progressing on the review of the school estate. In respect to that review, the Council at their meeting of 29 November 2018 agreed the indicative sequence and priority for investment as follows: Galashiels, Hawick, Selkirk and Peebles. That report noted that the property maintenance issues are not as significant for Selkirk or Peebles, however, both will still require expenditure; and due to potential role and capacity pressures particularly at Peebles the priority of strategic plans beyond Galashiels will continue to be re-assessed in a proactive manner. However, following the major fire at Peebles High School in November 2019, the</p>	
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		<p>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. <b>(198, 220, 277, 318)</b></p>	<p>Council has had to revise its capital plans, to not only replace what was lost, but maximise the opportunities to enhance facilities on the site. This has been undertaken in parallel with the planned significant concurrent investment to deliver new Community Campuses in Galashiels and Hawick.</p> <p>It should also be noted that additional discussion has been carried out with the Education Officer who has stated that there is sufficient school capacity available to accommodate the new proposals contained within LDP2.</p>	
Any other comments: Question 19	Process - Consultation	National Grid has no comments to make in response to this consultation. <b>(3)</b>	Comments noted.	No further action required.
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? <b>(203)</b>	The Local Development Plan for the area covers all of the Scottish Borders and includes over 80 recognised settlements. Contributors to the process, can home in on their areas of interest. It should be noted, that separate public consultations and documents for various parts of the Scottish Borders would increase the time taken and the cost in reviewing the Local Development Plan for the Scottish Borders.	No further action required.
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. <b>(206)</b>	Comments noted.	No further action required.
Any other	Process -	The contributor suggests the form could be made	The Council welcomes any	No further action

<p>comments: Question 19</p>	<p>Consultation</p>	<p>simpler for the general public to complete. <b>(285)</b></p>	<p>suggestions as to how the completion of the form could be made easier, although there is no evidence that this is a major issue</p>	<p>required, although further ways of simplifying the form will be considered</p>
<p>Any other comments: Question 19</p>	<p>Process - Consultation</p>	<p>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.</p> <p>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. <b>(243, 298)</b></p>	<p>The Scottish Government sets out guidance on how the community can effectively engage in the planning process in Planning Advice Note 3/2010: Community Engagement. Early engagement is defined as being the LDP Main Issues Report (MIR) stage. However, proposals have been developed to extend engagement proposals beyond the PAN's minimum requirement. Scottish Borders Council has in the past extensively consulted throughout the Local Development Plan Process and intend to do this again within the Local Development Plan 2 process.</p> <p>It should be noted that the Council undertake a range of techniques to inform all those interested in the publication of the Main Issues Report. These included: letters and emails were sent out to everyone on our contacts list. An events page was also created on the Council's website and the link was also included in Facebook and Twitter notifications. As part of the consultation period a series of drop-in sessions and workshops were organised across the Scottish Borders. A presentation was</p>	<p>No further action required.</p>

			<p>included in the evening workshop sessions outlining the main issues and proposals within that area. This provided a basis for further more in depth discussions and more focused questions after the presentation. The Council also published the Main Issues Report on Citizens Space, a software for managing public involvement activity and 172 responses were submitted in this format. In addition to Citizen Space, consultation responses were also submitted electronically via email and also in paper format. In excess of 300 responses were received in total, and all of these submissions will inform the production of the Proposed Local Development Plan 2.</p> <p>Whilst a letter drop to all Scottish Borders Council residents may appear a comprehensive approach to community engagement, it is also an extremely expensive option and in the current economic climate is not one that can be justified. However, it should be noted that neighbouring properties to development proposals will be notified at the Proposed Local Development Plan stage.</p>	
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.	The Planning Process is an open and transparent process. Decisions regarding any new Local Development Plan are taken at	No further action required.

		<p>Whilst sharing anecdotes may be ok this should also be backed with analysis.</p> <p>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. <b>(277, 289)</b></p>	<p>Council level. A summary of all responses received are presented to the Council along with any subsequent recommendations. Whilst there is a preference by many to respond online, the process continues to allow the public and other respondents to submit their consultation responses in paper format as well.</p>	
Any other comments: Question 19	Process - Consultation	<p>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 27 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 completed. <b>(318)</b></p>	<p>The Planning Process is an open and transparent process. Decisions regarding any new Local Development Plan (LDP) are taken at Council level. A summary of all responses received are presented to the Council along with any subsequent recommendations. Full copies of all the submissions are also available for member to view. Furthermore it should be noted that a redacted copy of all submissions were posted online at: <a href="https://www.scotborders.gov.uk/info/20051/plans_and_guidance/924/main_issues_report_-_consultation_responses">https://www.scotborders.gov.uk/info/20051/plans_and_guidance/924/main_issues_report_-_consultation_responses</a></p> <p>It should be noted that the Planning Portal is designed for use by the Development Management service.</p> <p>The Scottish Government sets out guidance on how the community can effectively engage in the planning process in Planning Advice Note</p>	No further action required.

			3/2010: Community Engagement. Early engagement is defined as being the LDP Main Issues Report (MIR) stage. However, proposals have been developed to extend engagement proposals beyond the PAN's minimum requirement. Scottish Borders Council has in the past extensively consulted throughout the Local Development Plan Process and intend to do this again within the Local Development Plan 2 process.	
Any other comments: Question 19	Process - Consultation	Scottish Government no longer comments on Main Issues Reports <b>(314)</b>	Comments noted.	No further action required.
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 <b>(305)</b> 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. <b>(231)</b>	Policy IS4 – Transport Development and Infrastructure proposes upgrades to the A72. Obviously there are many suggestions from the general public as to how and where the road network should be improved across the region. Prioritising and funding these works is always a challenge. The LDP continues to support and identify the extended railway link from Tweedbank to Carlisle via Hawick	No action required
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. <b>(283)</b>	In comparison to some areas of the Scottish Borders the northern part of the SDA has reasonably good transport links with Edinburgh. However, noting that our road network is particularly important in terms of promoting and enhancing the economic vitality of our area, we	No further action required.

			would agree that the continuous improvement of the road network is required throughout our area. Particular projects that have recently been undertaken to assist in improving the local road network in the Northern Strategic Development Area are improvements undertaken on the A72 at the Leadburn Junction and also at Dirtpot Corner.	
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). <b>(305)</b>	Comments and support noted.	No action required.
Any other comments: Question 19	Key Greenspace - GSHER1001 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. <b>(105)</b>	Comments noted. Contact should be made with the Neighbourhood Services section of the Council at the following webpage: <a href="https://www.scotborders.gov.uk/site/xfp/scripts/xforms_form.php?formID=143&amp;language=en">https://www.scotborders.gov.uk/site/xfp/scripts/xforms_form.php?formID=143&amp;language=en</a>	No further action required.
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. <b>(236)</b>	Comments noted. Green infrastructure and improved access to open space can help to build stronger, healthier communities. It is an essential part of our long-term environmental performance and climate resilience. Improving the quality of our places and spaces through integrated green infrastructure networks can also encourage investment and development. Opportunities for green infrastructure are considered	It is recommended that the Council continue to identify and support green networks within Proposed Local Development Plan 2. In addition it is recommended that the Council agree that opportunities for green infrastructure are



			and included within the Action Programme and within allocated site requirements where required.	considered and included within the Action Programme and within allocated site requirements where required.
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. <b>(272)</b> .	Comments noted. This would be dictated by the market and developers.	No action required.
Any other comments: Question 19	Target for mixed use / business and industrial / housing land	<p>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?</p> <p>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</p>	<p>For mixed use sites, the Council's Economic Development Section has identified a portion of business and industrial land where considered necessary and possible</p> <p>Policy PMD3: Land Use Allocations confirms that sites allocated for mixed use may be developed for a variety of uses subject to other Local Development Plan policies. Where there is evidence of demand for specific uses or a specific mix of uses, these may be identified in a Planning Brief and the site requirements detailed within the Local Development Plan.</p>	No action required.

		of land for economic use. <b>(277, 318)</b>		
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. <b>(25)</b>	The Council agrees that Local Development Plans should take due account of national guidance laid down by Scottish Government. However, it is also important that in the production of the Local Development Plan, local context is also included.	No further action required.
Any other comments: Question 19	Infrastructure Provision	<p>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.</p> <p>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. <b>(270)</b></p> <p>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.</p> <p>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</p>	Whilst the primary responsibility for operating the development planning system for the Scottish Borders lies with the Council, Circular 6/2013 Development Planning states that all interests should be engaged as early and as fully as possible. In addition that document also states “ <i>key agencies are under a specific duty to co-operate in the preparation of development plans</i> ”; this includes Scottish Natural Heritage, Scottish Environmental Protection Agency, Scottish Water and NHS (Health Board). The Council have consulted with all key agencies throughout the Local Development Plan process and will continue to do so. This then allows key agencies to plan according to their needs and demands also. NHS Borders have stated that they will continue to engage with SBC colleagues to provide primary care and public health input to the wider planning process including the creation of the next Scottish Borders Council Local	No further action required.

		<p>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 infrastructure. This review must examine the issues of:</p> <ul style="list-style-type: none"> <li>• Schools capacity.</li> <li>• Health facilities, to include GP services and access to hospital services.</li> <li>• Social care.</li> <li>• Sewerage and drainage capacity.</li> <li>• 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.</li> </ul> <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. <b>(90, 270, 277, 318)</b></p>	<p>Development Plan early in its preparation cycle as part of a Health in All Policies approach.</p> <p>Scottish Planning Policy requires LDP's to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Failure to meet this requirement would result in a failure to provide a plan-led system. In the consideration of any site for inclusion in the LDP, a full site assessment is carried out and the views various internal and external consultees (such as Roads Planning, Economic Development, Landscape, Scottish Water, SEPA, and NHS) are incorporated into that assessment. In doing this a rigorous site assessment process is used to identify the best sites possible. The site assessment also considers many issues in relation to transport and water/sewage infrastructure, and well as other environmental issues such as archaeology, biodiversity, flood risk and landscape.</p> <p>In addition, in respect to the Peebles</p>	
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			<p>Bridge issue, the most recent traffic count on behalf of the Council for Tweed Bridge was undertaken in November 2018. It is the Council's opinion that Tweed Bridge does not have the capacity to serve any development other than small infill proposals, but that this would be at the cost of increased congestion on the north side of the River at peak commuter times, and that these developments would take the existing bridge close to capacity. At this point in time there is no definitive date as to when the new bridge may be constructed and a feasibility study must be prepared in advance.</p>	
<p>Any other comments: Question 19</p>	<p>Infrastructure Provision - Peebles - Sites for new facilities</p>	<p>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. <b>(181)</b></p>	<p>Comments noted. As part of the Local Development Plan (LDP) review, the Council consult with all relevant stakeholders as part of that process. It should be noted that neither the Education Department nor NHS have advised on the requirement for new sites. In addition, should such a requirement arise during the lifetime of the LDP, there are policies contained within the Plan which will allow for such facilities to be supported at an appropriate location.</p> <p>It is noted that the Council is progressing on the review of the school estate. In respect to that review, the Council at their meeting</p>	<p>No further action required</p>

			<p>of 29 November 2018 agreed the indicative sequence and priority for investment as follows: Galashiels, Hawick, Selkirk and Peebles. That report noted that the property maintenance issues are not as significant for Selkirk or Peebles, however, both will still require expenditure; and due to potential role and capacity pressures particularly at Peebles the priority of strategic plans beyond Galashiels will continue to be re-assessed in a proactive manner. However, following the major fire at Peebles High School in November 2019, the Council has had to revise its capital plans, to not only replace what was lost, but maximise the opportunities to enhance facilities on the site. This has been undertaken in parallel with the planned significant concurrent investment to deliver new Community Campuses in Galashiels and Hawick.</p> <p>It should also be noted that additional discussion has been carried out with the Education Officer who has stated that there is sufficient school capacity available to accommodate the new proposals contained within LDP2.</p>	
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	Comments noted. It should be noted that the Neighbourhood Services section of the Council monitor available lairs in	No further action required.

		<p>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. <b>(318)</b></p>	<p>each of the cemeteries managed by the Council, and plan accordingly. Should the requirement for a new cemetery arise during the lifetime of the Local Development Plan then the new policy will be able to support an application for such a proposal at an appropriate site.</p>	
<p>Any other comments: Question 19</p>	<p>Lack of community engagement</p>	<p>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. <b>(91)</b></p>	<p>Comments noted. As part of the Local Development Plan (LDP) process, the Council undertook a 'Call for Sites' to assist in ensuring that any new sites identified through the new Local Development Plan would be effective. Landowners consequently submitted their sites for consideration. The MIR took steps to inform landowners of their site inclusions.</p>	<p>No further action required.</p>
<p>Any other comments: Question 19</p>	<p>Fairness and equality of what is best for residents</p>	<p>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. <b>(197)</b></p>	<p>It is considered the LDP gives sufficient weighting and consideration to all material considerations including the general public, health and well being.</p>	<p>No further action required</p>
<p>Any other comments: Question 19</p>	<p>Increased use of cars (as a result of development)</p>	<p>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</p>	<p>Whilst the LDP seeks to allocate sites within existing settlements there is also a duty to support the rural economy which is often raised by third parties who do not wish their communities to be ignored. It is also the case that due to a number of constraints it is not always easy nor</p>	<p>No action required</p>

		undertaken. <b>(197)</b>	possible to identify new sites within existing towns.	
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. <b>(197)</b>	The plan can only address matters during the period of the plan. Future plans will take account of any change in circumstance.	No action required.
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. <b>(197)</b>	The Council continues to promote and support the extension of Border Rail from Tweedbank to Carlisle via Hawick. Other longer term opportunities will require consideration of priorities and costs.	No action required
Any other comments: Question 19	Community Empowerment Act 2015	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.  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. <b>(305, 307)</b>	Comments noted. Information regarding the Community Empowerment Act is available to access from the SBC website; <a href="http://www.scotborders.gov.uk/community_empowerment_act">http://www.scotborders.gov.uk/community_empowerment_act</a> Any individual or community group are able to contact the council with any queries they may have about submitting a participation or asset transfer request to: <a href="mailto:communityengagement@scotborder.s.gov.uk">communityengagement@scotborder.s.gov.uk</a> or call the team on 01835 826626.  Comments regarding the LDP are noted.	No further action required.
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. <b>(277)</b>	It is considered the LDP is produced in a manner which allows and invites comments from a wide range of parties. All representations are given a full and fair hearing. It is not agreed that choices are driven by	No further action required

			developers.	
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. <b>(289)</b>	Comments noted. The LDP acknowledges and promotes digital connectivity improvements	No further action required
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. <b>(291)</b>	Comments are noted.  The Proposed LDP covers a range of subjects including; growing our economy, planning for housing, town centres, rural environment, built and natural heritage and sustainable climate change. The Plan aims to ensure that there is an adequate supply and range of allocations throughout all of the Scottish Borders for housing, mixed use, business and industrial and redevelopment sites. It should be noted that the Proposed Plan supports economic investment and growth within all areas of the Borders.	No further action required.
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. <b>(315)</b>	Comments noted.	The Council will continue to liaise with neighbouring authorities with regards to considering a wide range of mutual opportunities
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. <b>(297)</b>	The Council would refute this comment. The Proposed Plan addresses Border-wide issues as well as local issues.	No action required.
Any other comments:	Transport - Selkirk By-pass	The Selkirk and District Community Council supports the proposed A7 by-pass to avoid the	Comments noted. As stated within the Selkirk settlement profile, the	No further action required



Question 19		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 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. <b>(305)</b>	road capacity within the centre of Selkirk poses particular difficulties for traffic movement and parking. The line of the proposed Selkirk by-pass is protected by Policy IS4 – Transport Development and Infrastructure. This would provide the opportunity to further improve the town centre environment, enhance road linkages within the Central Borders and speed up journey times from Hawick northwards. Whilst the likely route of the bypass is safeguarded in the LDP, there is currently no Scottish Government commitment and further studies would be required to identify the exact line and establish community and environmental impacts.	
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. <b>(305)</b>	It is noted that the Local Development Plan currently identifies the most important green spaces within settlements. Selkirk Hills currently sits outwith the Development Boundary. It should be noted though, that Selkirk and the Selkirk Hills fall within the Strategic Green Network identified within the Local Development Plan. The Plan also contains a policy that aims to protect, promote and enhance green networks within the Scottish Borders.	No further action required.
Any other comments:	Education - Selkirk	Selkirk and District Community Council is of the view that a Masterplan and vision is required for	The Forward Planning Team has not been made aware of proposals to	No further action required.

Question 19		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. <b>(305)</b>	redevelop these sites and has not therefore highlighted this as a redevelopment site or noted the intention to produce a masterplan.	
Any other comments: Question 19	Common Good Land	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. For example, <ul style="list-style-type: none"> <li>• 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</li> <li>• (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. <b>(305)</b></li> </ul>	No sites have been submitted for consideration through the Local Development Plan process. Such proposals could, however, be considered through the Development Management process. It should be noted planning officers have met and discussed such issues with members of the Selkirk CC	No action required.
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	This site was allocated with an indicative capacity of 300 units through the process of the Council’s Supplementary Guidance on Housing. This was approved by the Scottish Government. The allocation of this site for mixed use development has therefore been accepted and cannot now be	No action required.

		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). <b>(305)</b>	questioned. The Council is in the process of preparing Supplementary Planning Guidance for the site which will guide and inform development at this location. Selkirk CC have been consulted on the SPG and can comment accordingly	
Any other comments: Question 19	Use of 'indicative' capacities	<p>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 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</p>	<p>Comments are noted regarding the indicative site capacities contained within the Proposed LDP.</p> <p>All housing allocations and those mixed use and redevelopment allocations with housing potential have indicative site capacities. The introductory text for Volume 2 states that the indicative capacity figure suggests the number of housing units the site could accommodate. This broad figure takes account of matters such as the site area of the allocation and the densities of existing surrounding housing. However, planning applications can be submitted for schemes which, for example, may incorporate smaller flatted units which in turn can increase the number of units on the site. This in itself does not necessarily mean the proposal could not be supported as other key considerations remain to be addressed. For example, consideration must be given to the design quality of the proposal and ensuring infrastructure can accommodate any proposed extra</p>	No further action required.

		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. <b>(318)</b>	units. Consequently, the site capacity stated is indicative only and should not be taken as a definitive maximum number of units a site could accommodate.	
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 <sup>st</sup> be granted to allow comment by the public. <b>(73)</b> .	There have been a high number of meetings conversations, public events etc. which have all helped shape the MIR. The points raised have all fed into the MIR which in essence has been prepared taking account of all the feedback received. The MIR was put into the public domain for comment and it is considered that a 12 week period for allowing third party comments is a quite generous and substantial period to allow this. All responses to the MIR were available for viewing to the general public when the MIR was refereed back to elected members of the full Council.	No action required
Any other comments: Question 19	Scottish Borders - scenic quality	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 policy has in fact protected our outstanding scenic qualities, for example through the actions taken in LDP1. <b>(73)</b>	Comments are noted. However, they are not specifically relating to the proposed policies contained within the Proposed Plan.  There are a number of policies within the adopted LDP, which seek to protect the scenic qualities of the Scottish Borders. These policies will be carried forward for inclusion within the Proposed LDP2 and have been updated where necessary and appropriate.	No further action required.

			<p>The Scottish Borders is an attractive place to live and work and this puts a clear responsibility on the Council to maintain the intrinsic qualities of the area whilst seeking the balance of promoting the economic stability and growth essential to the future viability of the area. It is essential to ensure that the right development occurs in the right place, and conversely, that development does not take place in the wrong place.</p> <p>Policy EP4: National Scenic Areas aims to protect and enhance the scenic qualities of the two National Scenic Areas within the Scottish Borders, by influencing the nature of development both within the sites and outwith them, where the development affects the setting and context of the NSA.</p> <p>Policy EP5: Special Landscape Areas aims to ensure that the local areas of identified landscape quality, known as Special Landscape Areas, are afforded adequate protection against inappropriate development and that potential maintenance and enhancement of the SLA is provided for.</p> <p>Policy EP6: Countryside Around Towns, aims to ensure that the identified Countryside Around Towns (CAT) area and the high quality</p>	
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			<p>living environment it provides is protected. The policy aims to prevent piecemeal development, which would detract from the area's environment, and to avoid coalescence of settlements, thereby retaining their individual identity.</p> <p>It is considered that these policies will assist in protecting the scenic qualities of the Scottish Borders.</p>	
Any other comments: Question 19	Delivery of Infrastructure	<p>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. <b>(137)</b></p>	<p>Each planning application must be judged on its own merits. Developer Contributions will be sought in some cases where considered appropriate</p>	No action required.
Any other comments: Question 19	Digital Connectivity - Heriot	<p>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</p>	<p>It should be noted that the Council support proposals that lead to the expansion and improvement of the electronic communications network in the Borders, provided it can be achieved without any unacceptable detrimental impact on the natural and built environment. However, it is not considered that the issue raised</p>	No further action required.

		(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. <b>(105)</b>	in this response is relevant to the Local Development Plan.	
Any other comments: Question 19	Wildlife and impact upon countryside	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. <b>(146)</b>	Comments are noted.  It should be noted that there are a range of policies contained within the Proposed Plan which aim to protect habitats and species within the Scottish Borders.  Policy EP1: International Nature Conservation Sites and Protected Species, aims to give designated or proposed Natura sites, Ramsar sites and sites where there is the likely presence of European Protected Species (EPS) protection from potentially adverse development.  Policy EP2: National Nature Conservation Sites and Protected Species, aims to protect nationally important nature conservation sites and protected species.  Policy EP3: Local Biodiversity Sites and Local Geodiversity Sites aims to safeguard and enhance local biodiversity.	No action required.
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	In relation to the future stages of the Borders Rail Project from Tweedbank through to Hawick and to Carlisle, the Proposed Plan contains an indicative safeguarded	No action required.

		<p>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. <b>(45)</b></p>	<p>line within the Policy Maps and a clear statement within Policy IS4 which states in the accompanying text that in the long term, the Council has aspirations to see the reopening of the Borders Railway southwards to Carlisle. Therefore, with regards to Phase 2 beyond Tweedbank there is significant work to be done in identifying the precise route. Once that has been undertaken it would then be appropriate to put the detail into settlement maps within the LDP. It is also suggested that to include un-researched detail within the LDP at this stage could leave the Council open to potential blight representations.</p>	
<p>Any other comments: Question 19</p>	<p>LUS Study</p>	<p>The contributor states that there are markers for LUS but there are still concerned about the ability to genuinely appraise quality of place and quality of life at a settlement level. <b>(236)</b></p>	<p>Comments are noted.</p> <p>The Council has produced a Land Use Strategy (LUS). The aim of the framework was to test the principles of the National LUS at a local level to see how they can be realised in a practical way. This was based on an ecosystem approach that may guide decisions that help integrate land management that could make best use of the land.</p> <p>It should be noted that the Council continue to promote the LUS and reference has been included within</p>	<p>No action required.</p>



			Policy EP3: Local Biodiversity Sites and Local Geodiversity Sites, to the Land Use Strategy.	
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> '. <b>(80)</b>	It should be noted that Part 2 Development Plan, Section 17 of the Planning etc. (Scotland) Act 2006, requires Planning Authorities to compile a Main Issues Report (MIR). It should be noted that the MIR is not intended to be a draft version of the Plan. Rather it focuses on the key changes that have occurred since the previous plan and on the authority's ideas for future development. It is noted that the MIR is required to set out the preferred and any reasonable alternative where these are available.	No further action required.
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. <b>(108 2 of 2)</b>	Comments are noted regarding the inclusion of the Scottish Borders within the SESPlan region. However, this matter is outwith the remit of the Proposed LDP. This is agreed at a strategic level and is not a matter for consideration as part of the Proposed Plan.	No action required.
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	Comments noted. Where the contributor has made site specific comments in relation to the management of surface water, these	It is recommended the following sentence be added to the introductory

		<p>the use of SUDS at the construction phase in order that the risk of pollution during construction to the water environment is minimised. <b>(119)</b></p>	<p>have been included within the site requirements in Volume 2 of the Proposed Local Development Plan.</p> <p>The reference to the use of SUDS in the construction phase has also been included within Policy IS9: Waste Water Treatment Standards and Sustainable Urban Drainage.</p> <p>It should be noted that the Council has also produced Draft Supplementary Planning Guidance in relation to Sustainable Urban Drainage which is currently out for public consultation. This guidance sets out good practice for the design, maintenance, safety and adoption of SUDS.</p>	<p>text of Policy IS9: Waste Water Treatment Standards and Sustainable Urban Drainage:</p> <p><i>'It is recommended that the requirement for all new developments to manage surface water through the use of SUDS also includes the use of SUDS at the construction phase, this is to ensure the risk of pollution to the water environment during construction is minimised.'</i></p>
<p>Any other comments: Question 19</p>	<p>Lowood (MTWEE002)</p>	<p>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: <u>Flood risk</u></p> <p>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 sewered 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>The Council is aware of constraints on the site, including flooding and the need for increased capacity at the Waste Water Treatment Works. These issues, along with others, were highlighted during the identification of the site through the process of the Housing Supplementary Guidance. Parts of</p>	<p>No action required.</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 help 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</p>	<p>the site are at flood risk from a 1:200 year flood event from fluvial and surface water flooding. Indeed, the site requirements for the site note that a Flood Risk Assessment would be required to assess flood risk from the River Tweed and the developer(s) would be required to demonstrate how the risk from surface water would be mitigated. Furthermore, consideration will need to be given to bridge and culvert structures within and adjacent to the site and the possibility of de-culverting should be investigated. These matters would require to be investigated through the process of any planning application. SEPA were consulted through the process of the Housing Supplementary Guidance and raised no objections to the allocation provided the aforesaid information was taken into account and addressed, where necessary.</p>	
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		<p>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 &amp; SAC/Habitats Regulatory Assessment</u></p> <p>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 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. 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</p>	<p>The site is adjacent to the River Tweed SAC. The HRA undertaken during the process of the Housing Supplementary Guidance concluded the following in respect of mitigation: <i>'Any housing development taking place on this site would still require to be acceptable under LDP Policy EP15, which confirms that development that would adversely affect the water environment would be refused. Furthermore, the development requirements for this site include a flood risk assessment, mitigation required to ensure that there will be no significant adverse effects on integrity of the River Tweed SAC, possibly an environmental impact assessment, a drainage impact assessment, contact with Scottish Water in respect of water treatment works, and the assessment of ecology impacts and the provision of mitigation. The above is considered</i></p>	
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		<p>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>  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 &amp; 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>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</p>	<p><i>sufficient mitigation for any potential minor effects on the SAC’. The HRA did not conclude that the development would have significant effect on the conservation objectives of the River Tweed SAC as stated by the contributor. The Housing SG was agreed by the Scottish Government. The Council is content that the requisite procedures have been followed in respect of the allocation of this site.</i></p> <p>The site layout and densities are being explored further through the preparation of Supplementary Planning Guidance relating to the site. The actual densities will only be formally established through the process of any future planning applications. The SPG will seek to ensure that any development does not have a detrimental impact upon the landscape characteristics and assets of the site.</p>	
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		<p>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 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</p>		
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		<p>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-</p>	<p>A replacement/supplement bridge crossing is not a direct requirement of the development of this site. It is not considered development of the Lowood site will prejudice a new bridge location when future options are considered at the appropriate time</p> <p>Noted and agreed.</p> <p>Noted and agreed. Liaison with Scottish Water and SEPA will be required in this respect.</p> <p>The Council is in the process of preparing Supplementary Planning Guidance which explores constraints and establishes development areas in closer detail. The respondent is welcome to submit any comments in respect of the draft SPG which is currently out for public consultation. However, it is re-iterated the site has recently been formally allocated and cannot be removed from the Plan</p>	
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		<p>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 set out for the Masterplan with regard to place making environmental considerations and principal aims require that:</p> <ul style="list-style-type: none"><li>• Clear guidance is provided on the delivery mechanism for the development of the site;</li><li>• A scale and mix of uses is proposed that are deliverable in the context of the prevailing and anticipated market conditions and that;</li><li>• The Masterplan needs to be comprehensive and cohesive based on a place making approach that is viable, sustainable and deliverable.</li></ul> <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</p>		
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		<p>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. <b>(92)</b></p>		
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. <b>(137)</b>	This design approach can, in some cases, be appropriate. This requires input from the Scottish Environment Protection Agency and the Council's Flood Risk and Coastal Management Team. Policy IS8 relating to flooding discourages development from taking place in areas which are, or may become, subject to flood risk. Where some level of risk may be acceptable, it also provides for development to be designed such as to minimise it.	No action required.
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	In 2019, a flood study was completed within Newcastleton, assessing the village's flood risk and highlighting mitigation options that may be taken forward for the prioritisation phase, to potentially gain funding for a Flood Protection Scheme within the 2022-28 flood	No action required.

		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. <b>(307)</b>	risk management cycle. These are matters which would require to be considered by Flood Risk and Coastal Management Team.	
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. <b>(73)</b>	The consultation process for planning applications through Development Management, and the consultation process for the Main Issues Report are two separate public consultations. In addition, the proposed detail of each are separate. All land allocations are subject to a wide range of consultations and public input and the LDP process has taken on board all matters submitted	No further action required.
Any other comments: Question 19	Local Housing Need - Newcastleton	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 <b>MUST</b> be more readily achievable or Newcastleton will become a village of pensioners.  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	Comments noted. These are issues which would require to be considered by Registered Social Landlords (RSLs) when developing in Newcastleton. It should be noted that the Local Plan does not allocate housing sites specifically for affordable housing or particular needs housing. Therefore, the LDP cannot specify requirements for tenure within the site. This would be assessed as part of any future application, in consultation with the Housing Strategy team. However, it should be noted that Policy HD1: Affordable Housing Delivery contained within the Proposed LDP aims to ensure that new housing development provides an	No action required.

		<p>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. <b>(307)</b></p>	<p>appropriate range and choice of 'affordable' units as well as mainstream market housing. The provision of affordable housing is a material consideration in the planning system, and the Development Plan is recognised as an appropriate vehicle through which it may be facilitated by Planning Authorities. Policy HD6: Housing for Particular Needs contained within the Proposed LDP aims to ensure that the provision for particular needs throughout the Scottish Borders. Therefore, it is considered that the Proposed LDP supports and promotes the delivery of affordable housing and housing for particular needs within the Scottish Borders.</p>	
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. <b>(307)</b>	Comments noted. The Scottish Borders is benefiting from the Digital Scotland Superfast Broadband Rollout which was programmed to connect 94.9% of premises to Fibre to the Cabinet Broadband by the end of 2018. The remaining gap in provision which comprises remoter rural areas and premises which suffer from 'long lines' will be addressed by the Scottish Government's R100 programme. It is critical that the region also maximises the provision of Full Fibre Connectivity to Business and the wider community. Policy ED6 – Digital Connectivity of the Proposed	No action required.

			Local Development Plan aims to encourage and improve digital connectivity in the Scottish Borders.	
Any other comments: Question 19	Transportation - 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. <b>(307)</b>	Comments noted. The comments raised relating to HGV's and timber wagons are not addressable through the Local Development Plan process. These will, however, be passed to the relevant section of the Council. The comments relating to the transport feasibility study are noted. The Proposed Local Development Plan is supporting of the extension of the Borders Railway from Tweedbank through Hawick to Carlisle.	Comments to be passed on to relevant section of the Council in respect of HGV's/timber wagons.
Any other comments: Question 19	Connections - Newcastleton	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. <b>(307)</b>	The Council is well aware and supports and promotes the need to improve broadband particularly in remoter rural locations. Policy ED6 of the LDP supports proposals to help delivery of broadband	No action required
Any other comments: Question 19	Forestation/ planting - Newcastleton	This continues to encroach on open farmland, particularly the upland pastures. Planning for planting is 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. <b>(307)</b>	Comments noted. Unfortunately these are not matters which can be addressed through the Local Development Plan process.	No action required.

Any other comments: Question 19	Sightlines - Newcasteton	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. <b>(307)</b>	Comments noted. Unfortunately these are not matters which can be addressed through the Local Development Plan process. This information has been passed onto the Policy Officer for the South of Scotland Alliance.	No action required.
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. <b>(307)</b>	Comments noted. These are not matters which can be addressed through the Local Development Plan process.	No action required.
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. <b>(307)</b>	Comments noted. These are not matters which can be addressed through the Local Development Plan process. These comments have been passed onto the Network Manager of SBC although it should be noted that these matters would require involvement of other Roads teams within the Council.	No action required.
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	Comments noted. It is likely Brexit will impact negatively on rural landowners and the Council must take on board the need for	No action required.

		<p>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. <b>(307)</b></p>	<p>diversification of land uses. Scottish Government advice promotes tree planting.</p>	
<p>Any other comments: Question 19</p>	<p>Opportunities for Carlisle airport - Newcastleton</p>	<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 &amp; 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</p>	<p>The Carlisle Airport has only recently been opened and it is at the early stages of the Council considering economic benefits it can offer. This is work in progress and there is no more the LDP can state at this point in time.</p>	<p>The Council will consider opportunities the Carlisle Airport can offer for the benefits of local communities.</p>

		<p>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. <b>(307)</b></p>		
Any other comments: Question 19	SESPlan 2 Decision	<p>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. <b>(129)</b></p>	<p>Comments are noted from SEPA.</p> <p>The MIR was prepared based upon the housing land requirements set out within the SESPlan Proposed Plan, which was derived from the HNDA 2015. This was in accordance with the SESPlan Housing Background Paper (October 2016), which set out the background, process and justification for the housing supply targets and housing land requirements.</p> <p>The comments regarding the status of SESPlan 2 are acknowledged. The current SDP was approved in June 2013. However, the proposed SDP which was intended to replace SDP 2013 was rejected by Scottish Ministers on the 16<sup>th</sup> May 2019. QC advice was that, whilst out of date, SDP 2013 remains the approved Strategic Plan and must therefore continue to be referred to. However</p>	No further action required.

			<p>advice also stated that whilst the proposed SDP was rejected there are elements of the supporting technical papers and documents which helped guide the proposed SDP and incorporate more up to date positions, which should be considered as material considerations. HNDA2 is at present the most up to date and therefore reliable assessment of housing need and demand in the SESPlan area.</p> <p>Appendix 2 of the Proposed Plan and the Housing Technical Note set out the housing land requirement and contributions towards the requirement for the Scottish Borders. The housing supply target and housing land requirement are informed by the HNDA2.</p>	
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# Strategic Environmental Assessment

## Strategic Environmental Assessment

Main Issue	Sub Issue	Summary of Main Issues Raised	Proposed Response to Main Issues Raised	Recommendation
Planning for Housing	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. <b>(164)</b>	Comments accepted. It is recommended that the scoring for Cultural Heritage of the SEA as it relates to site SCARD002 will be amended from neutral to significantly negative.	It is recommended that the SEA scoring for Cultural Heritage for site SCARD002 is amended from neutral to significantly negative.
Planning for Housing	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. <b>(164)</b>	Comments accepted. It is recommended that the scoring for Cultural Heritage of the SEA as it relates to site SEDDL001 will be amended from neutral to negative. In addition it is proposed to update the additional notes, SEA comments and Mitigation to reflect this change.	It is recommended that the SEA scoring for Cultural Heritage for site SEDDL001 is amended from neutral to significantly negative. In addition it is recommended to update the additional notes, SEA comments and Mitigation to reflect the proposed change.
Growing your Economy	Eshiels MESH1001 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	Comments accepted. It is recommended that the scoring for Cultural Heritage of the SEA as it relates to site MESH1001 will be amended from minor negative to significantly negative.	It is recommended that the SEA scoring for Cultural Heritage for site MESH1001 is amended from

		environment. <b>(164)</b>		minor negative to significantly negative.
Growing your Economy	Eshiels MESH1002 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. <b>(164)</b>	Comments accepted. It is recommended that the scoring for Cultural Heritage of the SEA as it relates to site MESH1002 will be amended from minor negative to significantly negative.	It is recommended that the SEA scoring for Cultural Heritage for site MESH1002 is amended from minor negative to significantly negative.
Planning for Housing	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. <b>(164)</b>	Comments accepted. It is recommended that the scoring for Cultural Heritage of the SEA as it relates to site AGALA029 will be amended from minor negative to significantly negative.	It is recommended that the SEA scoring for Cultural Heritage for site AGALA029 is amended from minor negative to significantly negative.
Planning for Housing	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. <b>(164)</b>	Comments accepted. It is recommended that the proposed mitigation for site ASELK040 in relation to Inventory Battlefield of Philiphaugh is amended to read: "Development must not have a negative impact on the key landscape characteristics and special qualities of the battlefield".	It is recommended that the SEA mitigation for Cultural Heritage for site ASELK040 is amended to read: "Development must not have a negative impact on the key landscape characteristics and special qualities of the battlefield".
Regeneration	All proposed	The contributor states that it is unclear why a site	Comment accepted.	It is recommended

	redevelopment sites	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. <b>(164)</b>	It is proposed that a site specific assessment will be undertaken for the Redevelopment sites at Proposed Plan Stage.	that site assessments are undertaken for all proposed redevelopment sites.
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