

February 2017 Peebles Community Trust Report

Annual General Meeting

The PCT Annual General meeting is to be held on Wed 15th February at the Peebles Rugby Club at 7.30.

SBC consultation on the draft Supplementary Guidance (SG) on Housing

Since our last report we have submitted our comments on the SG on Housing as it impacts on Peebles. A copy of this is attached at **Annex A**, and is also posted to the PCT website (www.PeeblesCommunity.org).

Updated website

We expect a revamped and updated PCT website to be launched during February.

March Street Mill site

Since our last report the owners of the March Street Mill site have submitted an application for Planning Permission in Principle (17/00063/PPP) for the demolition of all but the Engine Room and the cottage at the March Street entrance to the site, and their replacement with up to 70 housing units. This includes the relocation of the allotments to the lower level of the site. Allocations to commercial use / employment on the site is minimal within the proposals – illustrations suggest replacement of the Boiler Room with a single storey workspace, and location of two small lockups in residual spaces in the north west corner of the site where planning consultants have struggled to locate additional housing that complies with planning policies.

The PCT continues to take forward its ambitions to acquire part of the site for community use as a community / enterprise hub, retention of the allotments, and construction of a number of workshop units.

The site owners continue to stress that they will wish to sell the site to one developer / development consortium, and whilst in principle they are sympathetic to the ambitions of the PCT on behalf of the community, they do not see the PCT as a future purchaser of the site. To address this issue we have been seeking to take matters forward in collaboration with Hub SE, SBC and the SBHA. A meeting with these parties in January was not encouraging. In general, through SBC Capital Projects, SBC is not in a position to contribute any funding to the acquisition and development of this site. Without a public sector partner in any development, Hub SE is not able to take matters further (it is specifically set up to deliver capital projects with and on behalf of public sector clients). We are now seeking to identify developers that might be prepared to take forward a more community-focused development of the site – albeit within the realms of commercial viability. This includes potential collaboration with other RSLs (Registered Social Landlords).

We are of the view that development of this unique site can deliver significantly greater benefit to the community than is captured within the outline designs presented by Moorbrook in their outline planning application (see **Annex B** for a summary of PCT principles for development of the overall site). As matters stand, the owners' proposals sell the community short. The community has only two options – if it can purchase the whole site, in collaboration with a developer, it may be able to influence layout and design of any development; but crucially it is reliant on the planning authorities (and planning policies) to present some clearer limits as to how much of this site can be allocated to housing – both through the final form of the Supplementary Guidance on Housing and how it responds to the application for Planning Permission in Principle. There needs to be a more balanced development of this site, one that delivers lasting economic and community benefit to the town commensurate with the economic and cultural significance of this industrial site, whilst recognising

the need to deliver a financially viable development. Unfortunately money speaks, and despite political and policy support for Inclusive Growth, Town Centre Regeneration, Community Empowerment, and Land Reform, and Planning Policies (amongst them ED1 which places an onus on the *“retention of industrial and business use on strategic and district sites, including new land use proposals for business and industrial land”*) the community stands at a distinct disadvantage when it comes to raising the finances to bring about developments that work for the community.

If you would like to talk through any of these positions, please contact our secretary on myriam@PeeblesCommunity.org, or phone 01721 729839.

Peebles Community Trust

6 Crossland Crescent
Peebles EH45 8LF

30 January 2017

Dear Local Development Plan Team

Consultation on the draft SBC Supplementary Guidance on Housing

Below is our response to the consultation on the draft SBC Supplementary Guidance on Housing. It primarily addresses those issues relating to the settlement of Peebles.

Overall, we are pleased that a moderate line has been taken in respect of the scale of additional housing land allocations for Peebles – though this statement is not unconditional. This comment is made particularly noting the extraordinary expansion of housing in the town over the last fifteen years, the continuing pressure on the area from developer interest as shown by the high number of Peebles sites brought forward for consideration under the SG, and the fact that by all reasonable assessments more than adequate longer term provision of housing land has already been provided for in the adopted LDP.

We are pleased that the principle established in the adopted LDP that further development to the south of the town is contingent on the construction of a second road bridge across the Tweed is upheld in proposals in this draft SG. Further expansion of the settlement to the south constitutes a major issue for medium and long-term development of the settlement, and is one that requires careful and considered planning. This has the potential to impact planning in relation to future expansion of the town for decades to come, and should not be approached lightly or on an *ad hoc* basis. We strongly support the position taken to exclude the various sites south of the Tweed that have been presented for consideration under this SG.

For the allocations being proposed for sites north of the Tweed we do have ongoing concerns:

- ❑ Firstly, the basis for the additional allocation of 30 housing units to the Rosetta Holiday Park site, and how this impacts on this overall development is unclear. A PPP for development of up to a 100 housing units has already been approved, subject to conditions – particularly in respect of traffic, visual impact, and protection of the heritage values and assets on this site;
- ❑ Secondly, the “site requirements” for the former March Street Mills site presented in the draft SG fail to recognise and uphold the significance of this site as a key economic asset for the town; we are of the view (supported in the Peebles Town Action Plan and in the outcome of a 232 respondent survey on the future of the site, and LDP policy ED1 – Protection of Business and Industrial Land) that the site requirements need to be significantly strengthened (incorporating some form of quantification) to achieve at least an even split between social and economic use, and development for housing, so that the unique potential of this site is not lost to the town. This is not so much to do with the number of housing units attaching to development of the site (the site could accommodate these sorts of numbers as small form, high density units), but rather that clearer direction is needed on the disposition of land-use across the site;
- ❑ thirdly, we strongly support the proposal to reject including the Venlaw site in the SG; development of this site has previously been brought forward and rejected, the site is problematic and, crucially, development of this site would adversely affect the visual impact of this key entrance gateway to the town (the main approach from the north).

Our continuing concerns with the proposed additional housing allocations contained in the draft SG relate to a need to achieve clearer guidance on striking a balance between housing development and the physical infrastructure, economic and social needs of the town. We are particularly concerned that additional housing land allocations against the backdrop of generous recent, current and medium term housing land provision prolongs a rather blinkered direction of travel that offers considerable benefits to developers but comes at a cost to community. These developments not only fail to meet or contribute to the social and economic needs of the settlement, but in fact apply significant additional costs to the community. The rate and extent of modifications and improvements to the town's essential logistical, social and economic infrastructures over at least the last fifteen years have not kept pace with the expansion of housing in the settlement, and there is no sign that things are about to change. We highlight in particular three issues that are pertinent to the current SG on Housing – unresolved and worsening road traffic congestion, un-satisfied need for more affordable housing in the town, and inadequate allocation of land to economic use coupled with the practice of transferring formerly economic land to housing. This last point is of particular concern: where land formerly in economic use is converted to housing it means in practical terms a near permanent (at least several generations) reallocation of land use.

In the first instance we address visual impact and traffic. **Figs 1 & 2** illustrate the three potential Peebles sites north of the river – two sites brought forward within the SG and the third rejected. The main gateway to this traditional Borders town is arguably from the north along the Eddleston Water valley, where the first view of the settlement is against the backdrop of the range of hills to the south and framed in the near distance by the Venlaw escarpment to the east (the location of the Venlaw site) and the extended escarpment of the Rosetta Holiday Park to the west, rising towards Henderson Hill. The importance of this landscape setting is described in the Landscape Capacity Study of 2007, highlighting the particular merits of its “natural” setting. Any development of the Venlaw Hill site adversely affects the visual impact of this setting, and on this basis alone it is reasonably rejected. But the same impairment applies in respect of the development of housing on the Rosetta Holiday Park site and the re-orientation of the caravan and lodge elements of the site to the higher reaches of this site. We are unhappy with the proposals for development of this site as a whole, and believe that the SG should incorporate much greater detail on how the proposal to allocate a further 30 housing units to this site enhances and integrates with the already consented outline planning permission for this site.

In addition to the above, the area between Neidpath Road, Rosetta Road, Kingsland Road and Edinburgh Road, shown as shaded area around the March Street Mills site in **Fig 2**, is subject to increasing traffic congestion arising from raised levels of car ownership, the Victorian layout of the roads (pre-combustion engine), limited and constrained linkage to the Edinburgh and Neidpath Roads, and the fact that in practice Rosetta Road and Cross Street are effectively single track roads along most of their length. We note that the current outline planning permission for development of the Rosetta Holiday Park site is contingent on the construction of a vehicular bridge between Kingsland Road and Dalatho Street. But we observe that this new routing to Edinburgh Road only realistically benefits traffic movements to and from the Rosetta Holiday Park (i.e. it is self-serving to this site alone), and does nothing to mitigate the congestion affecting the area to its immediate south. We do not see how the addition of 30 further housing units to this site benefits Peebles in the slightest.

Traffic issues are also not adequately addressed in respect of the development of the March Street Mills site. Until very recently this site provided full-time employment to nearly 90 people, most of whom lived nearby. At its peak this site employed 350 people, who either lived nearby and walked to work, or were brought into town by train or by company bus. In addition to the argument that a significant proportion of the site should be designated for economic use, we are of the view that some constraints should be placed on the scale of vehicular movements on and off this site – i.e. that, by design, employment and residential accommodation on the site should be directed at

people who live and work locally. We argue that this could and should be achieved by allocating a significant proportion of the site to economic use, and designing any housing element of the site to small units (one and two bed units) with raised allocations to affordable housing and for rent through social landlords – conditions supported by existing planning policies in respect of Protection of Business and Industrial Land (ED1), Sustainability (PMD1), Town Centre Development (ED3), Quality Standards (PMD2), and Affordable Housing (HD1). We would suggest that these principles are adopted. A site requirements statement in support of low / reduced vehicular access to the site would provide a clear steer in this direction.

The retention of a significant proportion of this site for economic use is predicated on the basis that it has been in economic use for over 150 years, it has been the largest provider of employment in Peebles for most of this time, it is located proximate to the town centre (i.e. this is a central and accessible position within the town – and amenable to a range of economic and social uses fitting this location), and it is the only such site, not only within the central core of the town, but within the development boundary of the town as a whole. Should this site be lost to a housing only development, this would irrevocably and adversely impact the local economy and sustainable development of the town, and contradict a key component of the Scottish government’s economic policy – inclusive growth (creating opportunity through a fair and inclusive jobs market and regional cohesion).

We are of the view that the area currently used as allotments on the March Street Mills site should be retained for this purpose, both as a legacy of the historic community use of this site, and in alignment with the designation of this area as Key Greenspace within the adopted LDP.

In preserving some of the heritage value of this site and its historic use we are of the opinion that this would be best achieved through the retention of a significant proportion of the site for economic and community use, providing an important and lasting legacy of this important industrial site. In terms of its built heritage, we do not believe that the retention the Engine Room / Boiler House is in itself a necessary or representative emblem of this important site. It is not a listed building, which would make it subject to more onerous policies, and to most people in the town it is not representative of the mills as a whole. We would suggest that a more appropriate and durable legacy of the mills, and in keeping with the status of this site within the Peebles Conservation Area, would be the incorporation of some of the design features and materials of the buildings on the site – most notably the wooden clad tentering sheds, but also the boiler house and accompanying engineering sheds, and the repeating forms of the weaving sheds.

Yours sincerely

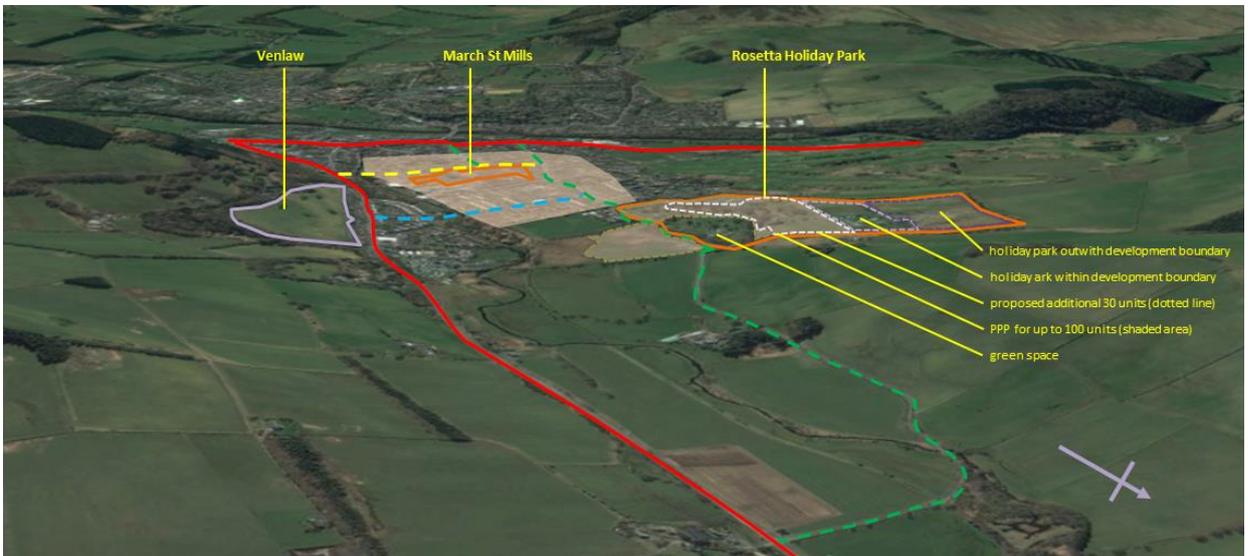
C R C Carleton
PCT Coordinator

Fig 1 – location of sites north of the river – (l to r) Venlaw, March St Mills, Rosetta Holiday Park



Backdrop graphic from Google Earth

Fig 2 – roads system – main N-S, E-W roads (red); effectively single track Rosetta Road & Cross Road (green); March Street, only E-W link between Rosetta & Edinburgh Roads (yellow); proposed Kingsland Square – Dalatho Crescent link (blue)



Backdrop graphic from Google Earth

Annex B - PCT ambitions for the overall site

From the perspective of ensuring that development of the site delivers a lasting community benefit our priorities are:

- **Jobs / employment** – as in clear incorporation of significant light industry / office premises and infrastructure component to any proposed development for the site as a whole
- **An integrated plan for the site** – avoiding unnecessary on-site segregation of activity in favour of truly mixed development (residential, commercial, community), encouraging public access (a combination of site permeability, connectivity and purpose)
- **Affordable housing** – of all colours, from small full-market, through mid-market affordable and housing association property to full-on social housing; we suggest cutting back on or eliminating detached and semi-detached in favour of apartments / flats – in line with identified needs for more affordable residential units; these should be more than blocks of flats
- **Integration of economic use** – to better integrate economic use into the fabric of the site, we suggest allocation of the ground floors / street level of all residential buildings for economic use – flexible, open plan facilities / units, encouraging mixed use; this is a trade-off offering a larger number of smaller residential units per area in return for fixed provision of economic development
- **Economic development** – the intention is to offer studio / workshop / office units for sale or rent; to have a training / development / incubator cluster within the community-developed and -operated complex; and to have trade workshop units for sale / rent located on the lower part of the site towards the Dovecot entrance
- **Community benefit** – we recognise the proposals to retain the allotments for community use, and to transfer a small part of the site for community development; in addition, however, we would suggest consideration is given to locating a public facility at the centre of the site – one that integrates all the other elements of the site; possible uses for such a building include training centre, nursery / pre-school / after-school facility, drop-in centre / social services, visitor centre / exhibition space
- **Amenity** – to have the site extensively landscaped to encourage public access and use, with footpaths, outdoor spaces, seating areas, water features, including use of the substantial embankment area; ideally we would wish to see the upper area of the site prioritised as pedestrianised / cycle friendly, with little or no permanent parking (delivery / access only; generous secure cycle parking/lockups), and the lower part of the site laid out for vehicular parking (though at well below one vehicle per housing or workshop unit) and for secure cycle parking; and the reservoir converted to a SUDS / wildlife area
- **Sustainability** – strongly underpin social and environmental deliverables – renewable energy (solar, geo-thermal), district heating (geo-thermal / biomass), enhanced insulation of buildings, grey water systems, pedestrians / cycling prioritised over motorised vehicles, significant incorporation of timber in building and infrastructures, integrating of allotment and on-site landscaped areas.

A number of the above are listed as priorities within the Peebles Town Action Plan, and are also captured in the Peebles Whole Town Master Plan that is in preparation – town-oriented planning and strategy documents prepared / in preparation by community groups under the leadership of the PCT.