



**Peebles
Civic
Society**

"Dedicated to the preservation, improvement and development of amenity in and around Peebles"

7th April 2022

22/00422/AMC – Erection of block of residential flats comprising 14 No units

The Peebles Civic Society **strongly objects** to this application because of the inappropriateness of the planned building next to the Grade B listed Kingsmeadows House in this scenic part of the Peebles Conservation Area and the impact this development will have on the ecology and wider environment of this invaluable woodland setting.

After purchasing this site, the developer Alan Mawer stated in 2015 that *"there are no plans to build houses ... the estate will remain a country estate and not become a housing estate ... [we will] not allow it to fall into the hands of developers who would be keen to maximise profits by building houses on it"* (Peeblesshire News 2nd April 2015). Having already applied unsuccessfully to build houses and a block of flats, Granton Homes are now returning with an applications to build a larger block of flats, we have no confidence in the statements made by the developers.

Conservation Area

This proposed development site is within the Peebles Conservation Area, and as such must be protected from inappropriate development, which we believe this is. The Local Development Plan 2, which is currently being formulated, recommends areas for future development and there is no need to build a block of flats in such a sensitive environmental and visual setting within the Conservation Area.

This proposed four story building (rather than the three proposed in the previous proposal) dominates the view from north bank of the Tweed, which at the moment consists of woodland, gardens and the Grade B Listed Kingsmeadows House. The proposed development will severely impact on this view. The Design and Access Statement states that "The design proposal is a sensitive response to the character of the local vernacular. It will sit comfortably within the existing grounds of Kingsmeadows House". We do not agree that this design is either sensitive to its surroundings or that it sits comfortably within the grounds.

Contrary to what is written in the Design and Access Statement we do not believe that this site is "suited to" further "residential development" or that the proposed development is "a residential development rooted within its surroundings that is well integrated with the local area". Neither is this oversized block of flats "a sensitive response to the character of the local vernacular". We do not understand how this development enhances "the overall character" of this site by removing 45 trees, building an unsympathetic building, car park

and an access road. This development has an overwhelming detrimental impact on the Kingsmeadows site.

For these reasons alone, this application should be rejected by SBC as the following policies are not met:

- Policy EP7 – Listed Buildings
 - this application fails to “respect the original structure in terms of setting, scale, design and materials” of the neighbouring Kingsmeadows House.
- Policy EP9 – Conservation Areas
 - Conservation areas “must be protected from inappropriate development”, which this is.

Environmental Impact

Our second main contention with this proposed application is the impact it will have on this invaluable mature woodland within the heart of the Peebles Conservation Area and the River Tweed Special Area of Conservation. The Kingsmeadows woodland is rare example of a semi-natural broadleaved woodland within a town and has been present for at least 225 years and probably much longer. Such an established woodland is not only important for the flora and fauna which live within it, but it also serves as an invaluable ecological link along the Tweed and connects to other woodland areas upstream and downstream. We cannot continue to nibble away at such important ecological sites, by removing “only” 46 trees now and perhaps more in the future as the developers press for more houses/flats. Replanting trees to replace mature ones removed for such an unnecessary development in no way replaces what has been lost. It takes decades, in fact centuries, to replace the habitats lost and redress the damage done. Scotland has low percentage of woodland cover (17%) and even less of the semi-natural woodland (1.4%) found at Kingsmeadows. Not only will the 46 trees, including notable, mature, early mature and semi-mature trees (this accounts for all but 2), be lost, but the construction site boundary will also damage the roots of many others. Ongoing survey work is resulting in a growing number of trees being registered with the Woodland Trust. As these woodlands are found within a conservation area, they are also protected by Section 172 (1) of the Planning Act. We simply cannot afford to reduce our broadleaved woodland cover and are in fact legally obliged to protect such places and increase biodiversity. This proposed development provides no benefits to the community or the environment and only benefits the developer, at the expense of damaging this important biodiverse woodland.

It is clear from comments submitted by others, and by Rueben Singleton in particular, that there are sound ecological reasons for this site not being developed further and there are also issues with some of the ecological surveys that have been undertaken on behalf of the developer. We note the case made by others of the many species and habitats that would be impacted by this development including red squirrels, bats, badgers, birds, insects and

flora. Mature trees provide such a range of habitats and even dead or dying trees are crucial in woodland ecology.

Scottish Borders Council, after considerable pressure, declared a Climate Emergency in 2020 and it has to recognise that doing so legally requires it to consider the climate and environmental impact of all its decisions. Removing mature trees, which play such an important part in sequestering carbon both with their wood and also the soils in which they grow means that unnecessary developments such as this must be rejected. Alternative locations for housing exist within Peebles, which are far less damaging, as set out in LDP2.

For these reasons, we believe that this development contravenes a range of environmental policies including:

- Policy EP1 – International Nature Conservation Sites and Protected Species
 - The impact on the River Tweed Special Area of Conservation and on bats has not properly been assessed.
- Policy EP2 – National Nature Conservation Sites and Protected Species
 - The impact on red squirrels has not been properly been assessed;
- Policy EP3 – Local Biodiversity
 - This development will reduce the biodiversity of the Kingsmeadows woodland and also further fragment the ecological corridor along the River Tweed.
- Policy EP10 – Gardens and Designed Landscapes
 - The landscape around the Grade B listed Kingsmeadows House forms an important part of the Peebles town landscape and Conservation Area. This development would have a detrimental impact on this.
- Policy EP11 – Protection of Greenspace
 - We must protect Greenspace in our towns as this provides environmental, social and economic services and plays an important part in defining the identity of the town. These repeated attempts to develop this iconic Greenspace provides no benefit to the town, but further fragments a biodiverse environment.
- Policy EP12 – Green Networks
 - This proposed develop fragments this important part of the Green Network along the Tweed and directly impacts on the wildlife that found here.
- Policy EP13 – Trees, Woodlands, and Hedgerows
 - As there is no need for this development and so no benefits to the local community, the negative impacts on the this biodiverse semi-natural woodland detailed above mean that this application should not be approved. The planting of trees in no way compensates for the loss of so many mature one. The Council must reject this application due to the damage that will be caused, with the only the developer benefitting.

For the reasons mentioned above, this application must be rejected and the Council should also take note of the strength of public opposition to his proposal, which currently stands at 429 at the time of writing, with no responses in supporting this development.

Yours faithfully

Anthony Newton

(Secretary, Peebles Civic Society)