

Keith Howell

The Forward Planning Team
Corporate Improvement & Economy,
Scottish Borders Council
Newtown St Boswells
Melrose
TD6 0SA

3rd December 2020

Dear Sirs,

Local Biodiversity Sites in Scottish Borders consultation

You wrote recently to my neighbour [REDACTED] regarding the proposal that the White Moss raised peat bog be given Local Biodiversity Site (LBS) status. My neighbour at White Moss Farm, [REDACTED] passed me a copy of your letter with the attached site plan. The site boundary set out on the plan covers an area that actually encompasses three separate ownerships. The purpose of this letter is to provide a submission to your consultation, providing clarification of site ownerships and property names, views on White Moss as a LBS, and a suggestion regarding a minor refinement of the proposed LBS on the land owned by my wife and I to more accurately reflect the true border of the peat bog.

I have attached 4 site plans, which I will refer to in my submission. These are numbered 1 to 4 as follows:

1. A copy of your original LBS map as attached to your letter – but with a correction to the [REDACTED] not the [REDACTED] on the map but rather [REDACTED] which it has been known as now for more than the 15 years that I have lived here with my family.
2. A photo of the site plan for our property [REDACTED] [REDACTED] as attached to the Land Register of Scotland – which covers the the central portion of the overall proposed LBS for White Moss set out on your original plan
3. A site plan for our property [REDACTED] and associated land, indicating the various neighbouring properties (which I will explain below), drawn up by architects for us some years ago when we secured planning permission for a sunroom and other works at our house
4. An aerial picture of the wider White Moss site, prepared and notated as part of a previous site survey prepared a number of years ago, I believe by Scottish Natural Heritage

Site ownership

The central portion of the wider [REDACTED] peat bog is owned by my wife and I (see plan 2), attached to our home, which is also known as White Moss (see the correction I have made to plan 1).

Referring to plan 3 our various neighbours are numbered (1) to (6). For the purpose of this exercise only three properties have ownership of parts of the proposed wider White Moss LBS, with our home and land in the central portion, the land to the west (at (1) on plan 3) covering all of the western portion of the LBS is owned by [REDACTED] the owner of [REDACTED]. Within that area, the house called [REDACTED] is owned by [REDACTED] daughter and her husband [REDACTED]. The eastern portion of the proposed LBS is owned by Mrs [REDACTED] owner of [REDACTED].

The purpose of the proposed White Moss LBS

I agree with the broad objective of the LBS to protect natural biodiversity and in particular to ensure the benefits to the environment of the raised peat bog continue into the future.

However, I note in the detail of the Site Statement under the heading of 'Management summary', that it says "Blocking of drains would be desirable". To this I would point out that the drains such as they are have not to my knowledge been touched for a very long time, probably over twenty years, quite possibly much longer. Passage of water along these drains (as they are noted on your original plan 1) is slow, impeded by reeds that have grown in abundance along them. There should not therefore be any need to 'block' drains, the White Moss peat bog is always wet and never in danger of drying out.

The specific concern of any active blocking of drains to alter the local water table would be the potential damage to all the four homes situated along the southern edge of the proposed LBS, either through actual flooding of the homes, or short of that, an undermining of their drainage systems. These houses are not on the mains drainage network but rather depend upon septic tanks and associated soak away pipes. Raising the water table could cause such soak away drainage to fail. So, the point I am making is that these homes have existed happily alongside the peat bog for very many years, with neither the peat bog or homes having any detrimental effect on each other. I would suggest that no changes are needed to the drainage of the peat bog to retain its biodiversity and natural environmental benefits.

The exact boundary of the proposed LBS

On the Land Registry plan [REDACTED] you will see the land in our ownership coloured in red – I have indicated with a dotted line how based on simply the lines of neighbouring land and ownership layout a more

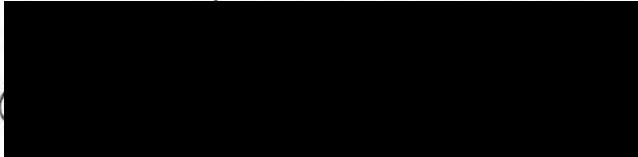
logical line of the southern edge of the LBS might be drawn. Looking at the aerial view of the site (see plan 4) you can see how this treatment is supported by the line of the peatbog and the bank running on its southern edge consisting of rock and clay upon which my house and outbuildings are built alongside wood and rough pasture. At the very least I would suggest it makes sense for the southern most line of the LBS to follow the dotted red line I have drawn on your original site map (see plan 1) so reflecting the reality of the site and not so closely wrapping round the existing home and outbuildings, or encompassing the woods and small area of rough pasture as though it were part of a biodiversity site which it is not.

I hope this is all clear, please feel free to contact me by phone or email if you would like to clarify matters any further.

Yours faithfully,

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Keith Howell

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