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**From:** [REDACTED]  
**Sent:** 19 January 2021 15:19  
**To:** localplan  
**Subject:** Scottish Borders Local Development Plan 2020  
**Attachments:** SBC LDP Response.docx

CAUTION: External Email

Dear Sirs

Please find attached our response to the Local Plan consultation.

We should be grateful if you would kindly acknowledge safe receipt.

Yours faithfully,

David Hughes  
Christine Hughes



19 January 2021

## **Scottish Borders Local Development Plan 2020**

### **Objection to BESH1001 – Land at Eshiels Proposed for Business and Industrial Use**

Dear Sirs

We wish to respond to the consultation on the Scottish Borders Local Development Plan 2020. We wish to object to the inclusion of BESH1001 which seeks to allocate land at Eshiels for business and industrial use for the following reasons:

#### **1. Introduction**

Eshiels and Glentress are scattered settlements of approximately 60 households located around 2 miles east of Peebles, straddling either side of the A72. They are set in a rural environment consisting of a small cluster of houses and farm buildings, with no visual connectivity to Peebles. Glentress is east of Eshiels and is the recreational hub of Glentress Forest; a number of houses are located just east of the entrance to Glentress Forest. Eshiels and Glentress are mainly south-facing in aspect. The scattered nature of houses in the area with many green spaces offers a visual impression of being rural whilst being within easy travelling distance of Peebles. Visitors, travellers and tourists approaching Eshiels and Glentress immediately feel the 'outdoor experience' as they travel east out of Peebles and enter the countryside for the first time.

The Eshiels and Glentress settlements are united in opposing development **BESH1001** in the Scottish Borders Council (SBC) draft Local Development Plan (LDP). We collectively believe that this proposal is totally out of keeping for an otherwise rural area, with no sense of place. Further it does not meet some of the Council's own 'Vision and Aims' and 'Policies' which are outlined below.

In addition the Council has set high planning standards for developments within the adjoining Glentress Master Plan (GMP). Although proposal BESH1001 is outside the GMP boundary it is virtually adjacent and will visually impact negatively on views to the south from Glentress Forest removing the sense of remoteness that visitors come to the area to seek.

## **2. Contradiction with Scottish Border Council Policies** *(from Volume 1 of Proposed Local Development Plan)*

**Sustainability Policy PMD 1 (Page 40).** This states that the Council will apply sustainability principles which will underpin all the Plan's policies. It includes numerous principles (paragraph 1.4) which the Council will adopt including:

c) *The **protection of natural resources, landscapes, habitats and species.***

h) *The **minimisation of light pollution.***

We feel development BESH1001 will totally contradict these two policies.

**Quality Standards Policy PMD 2 (Page 41).** This policy states all new development will be 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. It would appear that BESH1001 would fly in the face of this Policy since it clearly will not be integrated into the otherwise rural surroundings.

We do not accept the argument that the proposed new site would integrate with the nearby existing council depot and recycling plant since these are down a hill to the south of the A72, a good 200m to the west of the proposed business park, and are out of sight from the road. In contrast, BESH1001 would be in **full view from the A72** clashing markedly with its rural surroundings.

### **Special Landscape Areas Policy EP 5 (page 114)**

The aim of this SBC policy is to ensure that local areas of identified landscape quality, known as Special Landscape Areas (SLA) are afforded adequate protection against **inappropriate** development and that the potential **maintenance** and **enhancement** of the SLA is provided for (para 1.1).

The proposed development (BESH1001) is located within the **Tweed Valley SLA** in its entirety. It should never be suggested as a possible business park as this totally contradicts SBC's own stated policy to avoid developments within SLAs. It is clear that this proposed business park in the Tweed Valley SLA is **completely out of place**; it is incongruous and totally out of character. It adds to the urbanisation of the countryside and ribbon development of the Tweed Valley between Peebles and Walkerburn. It should be rejected by definition according to SBC's own policy.

### **Countryside around towns Policy EP 6 (page 116)**

Currently this policy seems to apply exclusively to the Galashiels to Melrose corridor. If the ethos of this policy is important why is the corridor from Peebles to Walkerburn not also designated in a similar way? It also needs protection from development.

It could be argued that a policy to resist development in the Tweed Valley SLA negates the need for a similar policy to apply to Peebles to Walkerburn but the previous sub-heading indicates how SBC may not observe its own policies in this regard. This difference in designation highlights an inconsistency in how the Council interprets its own policy.

### **Protection of Greenspace EP 11 (page 130)**

The aim of the policy is to give protection to a wide range of defined types of green space (also known as 'open space') **within** settlements and to **prevent their piecemeal**

**loss to development** particularly on the edge of towns. We would argue that development BESH001 would seriously threaten the greenspace within the Eshiels and Glentress area as one travels out of Peebles.

***Green Networks Policy EP12 (page 133)***

The aim of this policy is to promote and support developments that enhance Green Networks.

How is this proposal for a business park compatible with this policy when it would remove at a stroke approximately 5ha of green space?

This proposal will not extend and improve green network opportunities and links; rather it will destroy the possibility. A further reason for rejection of this proposal.

**3. Alternative possibilities for business park sites in Peebles**

A location for a business park **within** Peebles would help the Council meet its vision and aims for Sustainability and Climate Change by reducing the carbon load as people walk or cycle to the site. Conversely, a site two miles out of Peebles would be counter to any climate emergency initiatives and policies. The need for further business park type sites is acknowledged. However, any provision should be close to housing thus reducing the need to travel by car to work but encouraging walking or cycling.

One long-term mixed-use site of approximately 32.3 ha (**SPEEB005**) has been identified on the south side of the river. Note, the need for a second bridge over the River Tweed is, according to the Council, only required for future housing development (page 22para 4.12) **not** business park sites.

Other sites are available north of the river in Peebles:

- **RPEEB001** (0.41 ha) at Dovecot Road
- **MPEEB007** (2.25ha) at March Street Mill in central Peebles.
- **MPEEB006** (6.41 ha) at Rosetta Road
- **Cavalry Park** sits only 50% full. There is ample space for business units here for many years to come.

SBC has allowed '**Mixed**' sites within Peebles town to become 100% housing to answer the demands from developers. It therefore follows that Peebles is constantly short of business areas and instead adds to the strain on existing infrastructure (schools, GP surgeries etc.). If SBC stuck with its original plans and did not bend to the desires of housing developers, the current shortage of business parks would not exist.

It is worth noting the proposed Eshiels site would be very **inefficient in terms of useable land** and therefore tax-payers money. It is only 4.8ha gross. Land will then be lost due to:

- The need to widen the A72 at the entrance area
- The internal road layout
- Extensive tree planting to screen immediate Eshiels residents and
- The totally unuseable NW corner (around one-third of the site) which is far too steep for development.

- Net useable land will be around 2 hectares.

#### **4. Communication and consultation**

The 2018 SBC Main Issues Report (MIR) proposed two adjacent mixed-use development (MESH1001 and 002). These have now been rejected based on reluctance of current landowners to sell and objections from Historic Scotland of likely damage to the temporary Roman Camp.

The new proposed business park (BESH1001) was **not** in the MIR. This means the residents of **Eshiels and Glentress were never consulted** about this new proposed development. This is important since SBC are now considering **Compulsory Purchase** of the land for the business park which was not an option for MESH1001 and 002.

This is a major change of circumstances and the local residents have not had an opportunity to comment. We feel SBC have not fully complied with due process regarding proper consultation.

#### **5. Previous proposal including housing**

There is an argument that the earlier development proposals contained in the MIR for housing and business (MESH1001 and 002) was more coherent and had a logic; the two parts related to each other in that houses contain people, and people need somewhere local to work.

That does not apply to this proposed business park.

The **stand alone business park** seems less logical. It is in the middle of nowhere surrounded by fields on three sides and a main road on the fourth. The site will clearly infringe on the passive beauty of the area. It will be an eyesore, have a detrimental impact visually, stand out and look inappropriate in this rural setting.

#### **6. Feasibility Study**

Is there any evidence that the Council had carried out an employment study for the district? It is particularly pertinent to note that the demand for office space is likely to reduce as a result of the transition of many to home working and employers reducing the overheads arising from providing office accommodation.

#### **7. Climate Change**

The location of the proposed business allocation will generate additional vehicle movements travelling further than would be the case with a Peebles location. This will particularly be the case if there are units providing retail or professional services to the public. This will give rise to additional harmful emissions which is counter to national and local policies on reducing greenhouse gases and other pollutants.

## **8. Potential Flooding**

We are concerned that the development would create a flood risk due to an increase in rate of surface water run-off from the site combined with little 'fall' for drainage between the site and the Tweed.

## **9. Lack of existing infrastructure**

The site lacks any sewerage system which would need to be installed and be robust enough to protect contamination of the River Tweed. This is likely to be much more expensive than a site within Peebles.

## **10. Potential Conflict of Interest**

We understand that the Scottish Borders Council intends to acquire the site, by means of CPO if there is not a willing seller, and then develop it for business use. Many Councils have done this in the past to promote economic development but also more recently as budgets became tighter as a result of austerity measures as a means of creating revenue streams.

However, if the report that SBC intends to acquire and develop the site is correct this creates a conflict of interest since such a proposal should only come forward after a site has been allocated in an adopted Local Plan and not as part of the consideration of site allocations. This might well be considered to be a breach of proper process.

We hope the Council will give serious consideration to our objections which we are sure will be shared by many other residents and organisations.

Yours faithfully,

David Hughes      Christine Hughes