

From: [REDACTED]
Sent: 21 January 2021 17:34
To: localplan
Subject: Eshiels Proposal: BESH1001

CAUTION: External Email

Dear Council

I am opposed to the proposed development **BESH1001** in the Scottish Borders Council (SBC) draft Local Development Plan (LDP). I believe that this proposal is totally out of keeping for this rural area and will degrade the area's sense of place.

The development doesn't meet a number of the Council's own 'Vision and Aims' and 'Policies' as follows:

The Council has set high planning standards for developments within the adjoining Glentress Master Plan (GMP). Although proposal BESH1001 is outwith the GMP boundary it does lie almost 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.

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.***

I feel development BESH1001 totally contradicts these two principles.

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.

I 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 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 (BESHI001) is located within the **Tweed Valley SLA** in its entirety. It should never have been 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 development 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 BESHI001 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.

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 footprint 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 and encourage walking or cycling.

A long-term mixed-use site of approximately 32.3 ha (**SPPEEB005**) has been identified on the south side of the river.

Other sites are available north of the river in Peebles:

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- **RPEEB001**
- (0.41 ha) at
- Dovecot Road
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- **MPEEB007**
- (2.25ha) at
- March Street Mill in central Peebles.
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- **MPEEB006**
- (6.41 ha)
- at Rosetta
- Road
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SBC has a habit of changing '**Mixed**' sites within Peebles into 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:

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- The need to widen the A72 at the entrance area
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- The internal road layout
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- Extensive tree planting to screen immediate
- Eshiels residents and
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- The totally unusable NW corner (around one-third
- of the site) which is far too steep for development.
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- Net useable land will be around 2 hectares.
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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. I feel SBC have not fully complied with due process regarding proper consultation.

Previous proposal including housing

There is an argument that the earlier development proposals contained in the MIR for housing and business (MESH1001 and 002) were 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. **It will indeed stick out like a sore thumb!**

Additional Issues

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- Serious potential flooding possibilities due to increase in rate of surface water run-off from the site combined with little 'fall' between the site and the Tweed.

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- No sewage facilities at the site

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- Decrease in local biodiversity due to loss of open space

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- Owner unwilling to sell. Compulsory Purchase order will be required by SBC

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Yours faithfully

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- Jane Kennedy