

Archived: 25 January 2021 10:47:44

From: [REDACTED]

Sent: Fri, 22 Jan 2021 13:52:51 +0000ARC

To:

Subject: [REDACTED]

Sensitivity: Normal

Attachments:

[REDACTED]

CAUTION: External Email

Please find attached letters in relation to the above mentioned clients.

Regards

[REDACTED]

[REDACTED]

	ABBAY ROW, KELSO, TD5 7JF <a href="http://www.fbrseed.com">www.fbrseed.com</a>    	      
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SDM/PAM

22 January 2021

The Forward Planning Team  
Corporate Improvement and Economy  
Scottish Borders Council  
Council Headquarters  
NEWTOWN ST BOSWELLS  
TD6 0SA

Dear Sirs

**Local Biodiversity Sites (LBS) in Scotland  
(proposed for adoption)**

We write to make our written representation to the above proposal on behalf of J & T MacFarlane Ltd [REDACTED]. We note that you have included a large area of the farm, referred to as Boondreigh Burn and Raecleugh in your proposal for adoption as a Local Biodiversity Site. We wish to object to this proposal for the following reasons:

**1 Lack of Engagement**

Whilst we appreciate that this is a consultation process our clients were not notified that the site was being considered at an early stage and therefore were not able to discuss or agree on proposed boundaries.

The designation coverage appears broad brush with inclusion of areas of land that we consider of less ecological value. This is of huge significance to this farming business and we consider that this proposal requires to be discussed in more detail with our client and specific areas of the farm considered on their own merits rather than what we consider a much broader approach for inclusion.

**2 Supporting Evidence not Provided**

We have not been provided with any evidence or survey results supporting the inclusion and extend of the BDS area proposed in the Local Development Plan.

We would like to see copies of the recent plant survey which we understood is necessary for a full assessment of the site to be made. Our clients are not aware of any recent surveys being carried out and have not granted access for this. If historical data has been used we would wish to see copies and the results of the scoring system.

Our client is very appreciative of the important ecological value of areas of the farm, but such a widespread area of inclusion is deemed unnecessary and we wish to see the analysis and justification for all those areas included.

### **3 Protection of Site in Planning Context**

Our clients currently farm with the environment in mind however it should be noted that they do need to run their farming business to make a profit so that they can continue to manage the holding as they do. They are constantly balancing farming return and ecological value. Such designations will exert more control over what can be done on the farm and this could disincentivise the landowner from undertaking additional ecological work in the future.

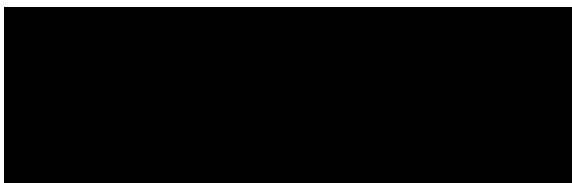
The farm will need to evolve to meet the needs of the business and there could also be scope for other diversified enterprises which would supplement core farming income. Accordingly, our clients do have concerns as to how the designation could impact on future farm developments such as new farm buildings and woodland planting. In addition, diversified projects such as short term holiday lets or wind turbines as examples.

Inclusion of areas of land that have less environmental value and with greater scope for future development should not be included wherever possible to enable future sustainability of the business.

In summary, we acknowledge the ecological value of parts of the farm however we would like to rationalise the areas covered and would suggest direct engagement with our client along with provision of copies of supporting evidence.

We look forward to hearing from you in due course.

Yours faithfully

A large black rectangular redaction box covering the signature of the Senior Surveyor.

Senior Surveyor