

Archived: 25 January 2021 10:46:05

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

21 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 Mr J McDougal, [REDACTED]. We note that you have included a part of the farm, referred to as [REDACTED] 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.

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 justifiable merits.

**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 overall scoring system.

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

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

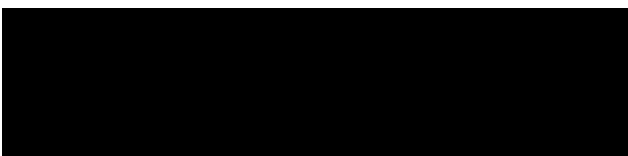
As noted above our clients are particularly conscious of the value of the ecological habitat they farm within. They consider that such control measures could disincentivise them from carrying out further environmental work as it may in turn create further restrictions. Our clients are concerned as to how such restrictions may prevent them from developing other projects on the farm such as construction of new farm buildings or diversified projects such as tourist accommodation.

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,



Sarah Mason  
Senior Surveyor