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From: [REDACTED]

Sent: Fri, 22 Jan 2021 13:08:43 +0000ARC

To:

Subject: OBJECTION TO LOCAL PLAN

Sensitivity: Normal

Attachments:

[REDACTED]

CAUTION: External Email

Dear Sirs

I attach my formal objection to the Local Plan. Please acknowledge receipt.

Yours Faithfully

Martin Drummond

SCOTTISH BORDERS LOCAL DEVELOPMENT PLAN
OBJECTION TO PROPOSED BUSINESS & INDUSTRIAL ALLOCATION
TOWN YETHOLM – POLICY BYETH 001

OBJECTION SUBMITTED BY
MARTIN DRUMMOND – [REDACTED]

Dear Sirs

I write to register my strong objection to the proposed Business and Industrial Development proposed in the Scottish Borders Local Development Plan which arises from the content of Policy BYETH 001.

I have a number of comments to make , as follows;

- The Council will be aware of its statutory responsibility to prepare a reasoned justification for the inclusion of land for development in any Local Plan. I would normally expect an allocation such as BYETH 001 to arise from a carefully considered examination of supply and demand for such use in the wider area and in particular, an assessment of industrial land supply in the market area. I am not aware such an assessment exists. If it did, it would quite properly consider smaller infill brownfield sites/backland areas within the settlement, and indeed other villages, and Kelso. The Council will be aware of undeveloped capacity at Pinnaclehill, Kelso. In my view, there is no need for development at this location. The Council should fully investigate other possible candidate sites of a brownfield nature in Yetholm, Morebattle and Kelso.
- It is not clear which Use Classes it is intended to accommodate by virtue of Policy BYETH 001. The Council will be aware of the potential within such a broad policy allocation for the potential of Light Industrial, Office Use, Storage, Warehousing, Distribution, General Industrial and, indeed, potentially heavier polluting uses all of which could arise in a broad policy application. Allocations such as this require to be reasoned and soundly based, as well as being capable of delivery. There are more suitable yards, strips of brownfield land and existing building in the village which could accommodate small scale business users.
- I do not comment extensively on National Planning Guidelines, Advice Notes and current Development Plan Policy, however, a strong underpinning argument, in planning terms, for the allocation of the site does not appear to exist. If the

justification for the allocation is that the Council has received “notice” that there is demand for such a use in Yetholm, then a proper comparison of potential sites in Yetholm, Morebattle, and Kelso, for example, should be undertaken. This should include consents not taken up, sites not fully developed, agricultural buildings/businesses who may wish to diversify by way of de minimis change of use, workshops/yards and brownfield land should be fully investigated. The allocation of this site is not based on sound planning judgement .

- The existing land use is agricultural, The land is capable of producing a wide range of crops and is also used for grazing. Loss of agricultural land is strongly opposed generally in planning policy. There are other more suitable brownfield sites in the locality.
- I understand that it is proposed to take an access to/from the proposed site via the Council owned site at Deanfield Lane. Policy RY1B refers. On 2 November 2020, I received a notification from the Council, for information only, that site RY1B remained allocated in the new draft plan. Curiously, consultation on the new plan commenced same day, 2 November 2020. The notification in respect of RY1B makes no reference to its proposed integrated development with site BYETH 001. As I understand it, this integration would relate to a new footpath, cycle way, vehicular link as well as possible joint sewerage and drainage. I do not believe the draft plan refers to the proposed integration of these two sites.
- I am aware that Councils may treat privately, (i.e contractually). with a neighbouring landowner under Local Government legislation if it can be shown somehow that a private contract is necessary for a development, or in this case, possible developments to proceed jointly. The proposed integration of the long undeveloped and infrastructure constrained site RY1B with proposed site BYETH 001 does appear to be unusual, given that the Council only became aware of the latter site during the consultation phase of the plan.
- Site RY1B has lain vacant for many years . It is not an attractive housing site and has not been developed during the timescale of the last development plan. Accordingly, it should be deleted from the effective housing land supply and, as such would then become a potential candidate site to be considered for other uses, possibly including light industrial, agricultural, horticultural etc.
- In relation to planning history, there has never been any development at this location nor within site RY1B. The allocation of the Council’s housing site for only 7 units appears to recognise that this is an undeveloped and unspoilt part of the Village. The intensification of use arising from the simultaneous development of these 2 sites would introduce an urbanisation into this corner of the Village which would be incongruent and completely out of character with the current scale and nature of development i.e residential uses in open space surrounded by countryside. I am aware

that residential development (single house) has been granted previously in the walled garden area of Yetholm Hall but has lapsed.

- In discussion with my neighbours in this area of Yetholm, it is proposed to engage a firm of landscape architects to review this allocation in landscape terms. That work has been delayed due to Covid but will be submitted as soon as possible. Notwithstanding the 25 January end of consultation period, I am sure the Council would wish to receive such information, which it does not appear has been undertaken as part of the justification for allocating this site.
- In my experience, the allocation of sites is normally based on a thorough criteria based assessment, including National and Local Planning Policies, general development control criteria and any other material considerations. In this case, a non statutory environmental assessment, including a full landscape assessment would be expected and prepared by the landowner and then assessed by the Council. Is such an assessment available ? . If so, I shall be pleased to receive a copy which would assist and inform this objection.

In summary, and in conclusion, I object to the allocation of site BYETH 001 for the above reasons. I also object to the proposed integration of the neighbouring Council owned residential site with it. I reserve the right to expand on or add to these comment either directly to the Council and /or to the Scottish Government.

Please acknowledge receipt of this correspondence.

Yours Faithfully

MARTIN DRUMMOND

25 JANUARY 2021.