

[REDACTED]

From: [REDACTED]
Sent: 24 January 2021 16:33
To: localplan
Subject: FW: Planning
Attachments: SBC Objection 240121.docx

CAUTION: External Email

I attach my objection to the proposed business and industry site (reference BESH1001) within Scottish Borders Draft Local Development Plan 2020.

I would be grateful to have an acknowledgement of this email and attachment.

Yours faithfully,

Willie Macleod



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Scottish Borders Council – Draft Local Development Plan 2020

Proposed Business and Industry Site at Eshiels – Site Reference: BESH1001

Preamble

Alongside the great majority of the community of Eshiels and Glentress I express my strong opposition to the proposed development of the site (reference BESH1001) for industrial and business use as set out in the Council's Draft Local Development Plan. Not only is the proposal totally inappropriate for an essentially agricultural, rural and residential area, it has been progressed for inclusion in the draft Plan:

- With scant regard for the Council's own policies and practices;
- Without the consent of the landowner;
- Without any evidence of the demand for such use, seemingly, any robust assessment of alternative, more suitable sites or locations or, indeed, assessment of viability;
- Without any assessment of cost likely to be borne by the Council in securing the site, preparing it for development, promoting it to potential developers or the timescale over which this can be achieved.

It is hoped that the following observations provide ample justification for the rejection of the proposed business and industry site at Eshiels.

Options and Alternatives

There are alternative, and more appropriate, sites / locations for industry / business use in Peebles that would meet Council objectives for sustainable economic development, and which could absorb potential demand for such space for a period in excess of the five-year life of the LDP. The site at Cavalry Park, Peebles is not near capacity (understood to be around 50% occupied). The proposed location at Eshiels is clearly at odds with Council policy; other locations would be closer to where people live and would reduce the need for additional vehicle journeys including travelling to and from workplaces by car.

There are other sites, north of the Tweed in Peebles, which could more suitably meet Council development aims and would not place additional pressures on the bridge which, in any case, according to the Council would only require to be augmented by a second crossing to accommodate future housing and not business / industrial use:

- RPEEB001 - Dovecot Road;
- MPEEB007 - March Street Mill;
- MPEEB006 - at Rosetta Road.

Reality Check

The location, topography and lack of necessary infrastructure render the proposed site at Eshiels extremely inefficient in land-use terms (and therefore profligate with council tax and business rate-payers money). The site extends to 4.8ha and space will be reduced to take account of: the need to allow access from the A72, provide internal roads, landscaping and planting and take account of less-useable areas such as the north-west corner which is too steep for optimal development. This will reduce the developable site area by c50%.

Compliance with Scottish Border Council Stated Policies (*Reference: Volume 1 of Proposed Local Development Plan*)

- Sustainability Policy PMD 1 (Page 40 of Proposed Local Development Plan).
This states that the Council will apply sustainability principles which will underpin all the Local Plan policies. This sets out various principles which the Council states it will adopt including:
 - c) The protection of natural resources, landscapes, habitats and species,
 - h) The minimisation of light pollution.The proposed development (BESHI001) will totally contradict these two policies.
- Quality Standards Policy PMD 2 (Page 41).
This 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 landscape surroundings. BESHI001 is contradictory to this as it will not integrate into the otherwise rural surroundings. The community asserts that the proposed development will not, as inferred, integrate with the nearby Council depot and recycling centre as these lie to the south of the A72 at some distance from the proposed business park and are not visible from the road. Site BESHI001 would be in plain sight from the A72 and intrude outrageously into the surrounding landscape.
- Special Landscape Areas Policy EP 5 (page 114)
This policy seeks to ensure that areas of identified landscape quality, known as Special Landscape Areas, are afforded adequate protection against inappropriate development and that the potential maintenance and enhancement of the Special Landscape Area is provided for. The proposed site (BESHI001) is entirely located within the Tweed Valley Special Landscape Area. It's inclusion in the Plan as a possible business park should never have been countenanced as it is contradictory to the Council's policy against development within Special Landscape Areas. The proposed development in the Tweed Valley Special Landscape Area is incompatible with Council policy, is absurd and is inconsistent with the landscape setting. It creates an unwelcome and unjustified precedent for ribbon development along the A72 and has no place in a plan being proposed by any responsible and supposedly democratically accountable local authority.
- Countryside Around Towns Policy EP 6 (page 116)
This policy seems to be applicable only to the Galashiels to Melrose corridor. If the Council's intention is equitable policy application throughout Scottish Borders, what is the justification for the policy not being similarly being implemented between Peebles and Walkerburn? This further indicates that the Council ignores, or selectively applies, its own stated policies.
- Protection of Greenspace EP 11 (page 130)
This policy aims to protect a wide range of green or open space within settlements and prevent piecemeal loss of such space to development particularly on the edge of towns. Were site BESHI001 to be developed, it would seriously erode the greenspace between Eshiels and Glentress.
- Green Networks Policy EP12 (page 133)
This policy is intended to promote and support developments that enhance green networks. It is difficult to comprehend how a development such as proposed in the Local Plan fits with such intent when it blatantly and quite

unnecessarily removes some 5ha of green space? This proposal will do nothing other than remove green space and destroy green network opportunities and links.

Other Considerations

A business park in this location is illogical, incongruous and at odds with Council policy. The site is inappropriate, lies in a predominantly rural, scenic location surrounded by agricultural land and is bounded by a main road (A72) which is intersected by many existing (and difficult, if not dangerous) access lanes to fields, farms and residential premises.

In practical and development terms, there is:

- Real potential for flooding due to surface water run-off from the site;
- No mains sewage or drainage at the site;
- An unwilling seller.

Moreover, The Council's Main Issues Report (2018) proposed two adjacent mixed-use development sites (MESH1001 and MESH1002) both of which have been rejected based both on the current landowner's unwillingness to sell and objections from Historic Environment Scotland concerning the proximity of the Roman Camp.

The new proposed business park (BESH1001) was not included in the Main Issues Report meaning that the community was not consulted about this particular proposed development. This is a critical matter as the Council has declared that is considering compulsory purchase of the business park site (not put forward as an option for the sites designated as MESH1001 and MESH1002). This represents a material change in circumstances on which the community has had no opportunity to comment. The Council has failed to follow accepted communication and consultation practice.

William Macleod



24 January 2021