

From: [REDACTED]
Sent: 24 January 2021 15:09
To: localplan
Subject: Scottish Borders Local Development Plan: Proposed Plan; - Representation
24.01.2021
Attachments: Individual Representation to SBC LDP 2021.01.24 - D. Wright.pdf

CAUTION: External Email

To: Forward Planning, Scottish Borders Council, Council Headquarters, Newtown St. Boswells, Scottish Borders TD6 0SA
From: Douglas Wright, [REDACTED]
Please find below my Representation in respect of the Proposed Scottish Borders Local Development Plan.
[Also attached as a PDF]

Scottish Borders Local Development Plan: Proposed Plan - Representation

This representation relates to the Business and Industrial Development and Safeguarding Proposal **BESHI001**, for land at **Eshiels** within the Proposed Local Development Plan (LDP). I **object** to the proposed allocation for the following reasons, on the basis of which I suggest that the allocation of this site for the stated purpose be deleted from the Proposed LDP by Scottish Borders Council, - failing which, by the Reporter in due course, that it should not be included as a part of the adopted LDP.

Ownership

The owner of the site has not promoted the site for business and industry through the local development plan process, plus I understand the owner has indicated that the land is not for sale. SBC does not own the site, is unlikely in the foreseeable future to be in a position to tie-up the Council's strained funds on a Compulsory Purchase Order, together with the other expensive outlays which would be required to develop the site.

Constraints

The Proposed LDP 'Eshiels Settlement' document (in Vol. 2) indicates **Key Infrastructure Considerations** outlining many and various serious constraints which have not been adequately assessed, including flood risk; the absence of any public foul sewer within the vicinity; landscaping to mitigate impacts on the wider setting; assessment of ecology impacts; assessment of potential impacts on River Tweed Special Protection Area and Site of Scientific Special Interest; Drainage Impact Assessment and Water Impact Assessment; and, potential contamination to be addressed. It also highlights a requirement for a new vehicular access to be created from the A72 into the site. The site therefore appears to be the subject of several serious constraints which are likely to preclude the development of the site.

Where, and How, would SBC propose to route drainage from the site? Opposite the site is a 'double-line' of private residential housing, south of which is a steep down-slope on to agricultural land.

Infrastructure

The site is greenfield with so many infrastructure constraints that have yet to be assessed and deemed acceptable with regard to the location plus national and local designations. These should have been assessed in detail before this stage to ensure that the site could be made effective within the LDP period.

Land Use

The site has been designated within the Proposed LDP for business and industry by the Council. I suggest that that the site is **not** an appropriate site or location for business and industry. **The UK must safeguard its agricultural land in order to support farming to produce local crops and livestock to sustain a growing population, - plus reduce the country's reliance on the import of food items**

widely considered to be sub-standard to those of UK home-produced food items. The UK now needs to be more self-sufficient. This site is not needed for business use.

Landscape

The proposed allocation site on the north side of the A72 is in the Tweed Valley Special Landscape Area (SLA). The sloping greenfield site is very prominent in the attractive landscape setting below Glentress Forest. The proposed exposed development will have a material detrimental impact upon the area plus be incongruous within the wider landscape. Its existence would no doubt also add further development pressure at this location and encourage ribbon development along the A72.

The proposed 'business park' would presumably have street lighting, and inevitably various elements of security lighting, on a full 'hours of darkness' basis. It follows that in addition to the proposed business 'park' being an 'intrusion' in the landscape during daylight hours, - it would become a brightly lit, very stark intrusion during the hours of darkness, - not only to passing traffic, including visiting tourists, but form a long-term 'nuisance' to residents of property north and south of the site, particularly those in the higher area. Suggested tree-planting around the site, would do nothing to enhance the residential amenity of the cottage located at the south-east corner of the site, (situated almost opposite the Eshiels Mill junction).

Ecology

At the MIR stage, the Council's Ecology Officer concluded that there was a moderate biodiversity impact with potential for bats (EPS), badger and breeding birds. The wider site having an improved pasture with mature broadleaf treeline on the boundary and field boundary. The development of the proposed allocation would not align with the requirements of sustainability set out in proposed Policy PMD1 'Sustainability' regarding protection of landscapes, habitats and species

Transportation

The site lies 2 miles to the east of Peebles. Employees at, and customers of, the proposed business area at this location would inevitably result in an increased volume of private car use to access the premises, in addition to potentially increased goods traffic. There is a bus stop in close proximity to the site, but the buses block the carriageway when stopping to drop passengers off/pick them up, which provides a road safety issue, and there are no suitable safe areas for pedestrians to wait for buses to arrive. Significant improvement is also required to pedestrian infrastructure along the A72 between Peebles and the Glentress Forest junction.

There are no 'pavements' on the A72 eastwards from the eastern outskirts of the town. There is only one 'footpath' along the south side of the road. The footpath is narrow and of varying width. Its solum is not 'solid'. The width is frequently narrowed considerably, both by weed encroachment from its boundary fence-line, and by overgrowth from adjacent fences, hedges and tree branches on a lengthy stretch from around the Kerfield Farm area along to a point east of the Eshiels Mill junction. It is difficult on many occasions for pedestrians to walk two-abreast along this footpath, worsened by the buffeting effect of fast-moving, heavy traffic, and endangered by cyclists on the footpath. Persons walking with young children, including with prams / push-chairs, or dogs are particularly at risk, more so when meeting other pedestrians or cyclists moving in the opposite direction.

The Eshiels Settlement Plan displays the A72 road with an implication that it is a long, virtually 'straight', level stretch of road from a point west of the SBC Depot and Recycling Centre, eastwards to the Glentress Forest entrance. This is not the case! The map "masks" the fact that from a 'blind' corner and summit at the west end, the road continues on a slight downwards trajectory eastwards to a point at the south-west corner of the proposed site, opposite the Eshiels Mill junction on the south side of the road. At that point, there is a 'blind bend' in the road not indicated on the map. There is a cottage situated on the north side of the road at that 'blind' bend.

Despite a 50-mph limit on the A72 road east of Peebles, there is regular daily incidence of vehicles travelling both east and west at speeds clearly in excess of that limit. Drivers travelling at the 50-mph limit are frequently 'boot-bumped' and/or overtaken by impatient drivers, many of whom, though not all, are driving trade vehicles. At various times of the day, the existing volumes of traffic on the A72 along the 50-mph restricted zone between Peebles and the Glentress Forest junction are such that vehicles endeavouring to exit from residential and other access points along that road, including from the SBC Depot and Recycling Centre, have extreme difficulty in making safe exit manoeuvres. There is little evidence of traffic speed enforcement measures being conducted regularly on this restricted road. Apart from the area in the immediate vicinity of the SBC Depot & Recycling Centre, where the road is widened to enable right-turning traffic from the west, the road is normal two-lane width, causing a road safety hazard whenever there is a stationary vehicle, including buses, on the route. The addition of the proposed site and its proposed nature would inevitably result in an increased level of traffic entering and leaving the site, plus with 'cross-over' difficulties. The site Constraints list has identified a requirement for a new vehicular access to be created from the A72 into the site.

While a multi-use shared pathway exists from Peebles to Innerleithen, routed to the south of the SBC Recycling Centre some distance from the proposed site, cyclists wishing to access the proposed site from there would require to conflict with traffic at the

SBC Depot and Recycling Centre, plus cross the busy A72 road. Already many cyclists persist in cycling along the narrow, unmade footpath along the south side of the A72 road, at risk from traffic and conflicting with pedestrians. **The proposed site would exacerbate road safety issues.**

Hydrology

Currently there is no foul sewer servicing the site. The existing roadside drains along the A72 road frequently become ‘choked’, resulting in excess roadside water, left without effective clearance often for lengthy periods, and affecting the state of the adjacent unmade footpath.

The proposed site is potentially at risk of flooding, plus ‘run-off’, increasing the probability of flooding elsewhere, including a serious impact on the adjacent public road. Consideration must also be given to the potential adverse impact of flooding on the residential housing adjacent to the south side of the A72 road, including those within the Eshiels Mill cul-de-sac, into which excess flood water could flow and impact on properties there.

Summary

There are considerable Constraints in the Proposed LDP, and emphasised herein which would preclude development of the site within the lifetime of the LDP2. I therefore object to the proposed site and request that the site is deleted from the Proposed Plan.

I look forward to confirmation that this representation has been received.

Douglas Wright,

[Redacted signature line]

[Redacted address line]

.....
.....

Regards, Douglas

[Redacted closing line]

* Please note, - as I do not have the option to auto-request 'Read Receipts', - it would be helpful to get a brief 'Acknowledgement' response to indicate you have received and read this email. Thank you.

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