



19th January 2021.

Forward Planning
Council Headquarters
Scottish Borders Council
Newtown St Boswells
TD6 0SA

Via email: localplan@scotborders.gov.uk

Response to Scottish Borders Local Development Plan: Proposed Plan for Site Code BESH1001.

Dear Sirs,

Whilst the main text below outlines where the proposed development is in direct conflict with SBC policies and therefore should be rejected there are a number of other considerations that need to be taken into account.

- 1) There is no mains sewerage provision in this area at all.
- 2) Building on the site will increase flood risks to surrounding areas as natural soakaway drainage will be lost and that water will be discharged onto adjoining areas which may not be able to accommodate the additional load.
- 3) Approximately one third of the site is on too steep a slope to develop thereby reducing the usable land to approximately 2Ha. This compromises overall financial viability – it simply would not justify the expenditure as the returns would be so limited.
- 4) An additional road junction will need to be created on the A72, on a section which has already had several, and recent traffic accidents caused by vehicles turning off the A72. An additional junction would increase this accident risk even further.
- 5) The out-of-town location does not align with green environmental policies as the site would encourage people to drive to the location and increase the carbon footprint at a time when pressure is needed to reduce pollution.
- 6) In the current pandemic climate businesses are shrinking and closing thereby multiple existing business premises are becoming vacant. Simply providing more at a time when demand is unfortunately decreasing does not make sound business sense. In the future any new business should be encouraged to utilise existing facilities otherwise those, or the new ones, will remain empty and become a derelict eyesore.

The aspects of the proposal identified above coupled with these below registers my objection to the proposals. The points outlined below are not in any specified order or ranking of priority.

7) *Page 323 Local Development Plan; Settlement profile Eshiels.*

In the first paragraph of the section Placemaking considerations, the document prepared by Scottish Borders Council, the very first sentence states, "Eshiels is located in the heart of the Tweed Valley Special Landscape Area." And is followed by "The character of Eshiels has been established particularly by its layout and setting – it is located where the lower slopes of Cardie hill and Falla Brae slope down to meet the River Tweed."

The above clearly defines and confirms that Eshiels is a rural community hidden away within a recognised and acknowledged scenic area in the 'Heart of the Tweed Valley Special Landscape Area.' It also reiterates that the character has been established 'particularly by its layout and setting'. By virtue of these definitions alone this should make Eshiels totally unsuitable for the proposed development of a business park. Such a development would be wholly out of place in the surroundings and visually stick out like the proverbial sore thumb. The layout of the land sloping upwards from the A72 serves to boldly present any development making it visually obvious and any potential screening impossible. Thus, the proposed development flies in the face of the Council's own definition of what Eshiels is and represents.

In addition, the Council has set high planning standards for developments within the adjoining Glentress Master Plan (GMP). Whilst the proposal BESH1001 is out with the GMP boundary it does lie adjacent to it and will visually impact negatively on views to the South from Glentress Forest thereby removing the sense of rural remoteness that visitors specifically come to the area to seek and enjoy.

Contradictions with *Scottish Border Council Policies (from Volume 1 of Proposed Local Development Plan)*

8) Special Landscape Areas Policy EP 5 (page 114)

The aim of this SBC policy is to ensure that local areas of identified landscape quality, known as Special Landscape Areas (SLA) are afforded adequate protection against inappropriate development and that the potential maintenance and enhancement of the SLA is provided for (para 1.1).

The proposed development (BESH1001) is located within the Tweed Valley SLA in its entirety. It should never be suggested as a possible business park as this totally contradicts SBC's own stated policy to avoid developments within SLAs. It is clear that this proposed business park in the Tweed Valley SLA is **completely out of place**; it is incongruous and totally out of character. It adds to and promotes the urbanisation of the countryside and ribbon development of the Tweed Valley between Peebles and Walkerburn. It should be rejected, by definition, in line with SBC's own policy.

9) Countryside around towns Policy EP 6 (page 116)

Currently this policy appears to be being applied exclusively to the Galashiels to Melrose corridor. The ethos of this policy must be recognised by the Council as being important for it to be in place and applied, so why is this important policy not being applied to the corridor from Peebles to Walkerburn? It also needs protection from development.

It could be argued that a policy to resist development in the Tweed Valley SLA negates the need for a similar policy to apply Peebles to Walkerburn, but the previous sub-heading indicates how SBC chooses not to observe its own policies in this regard. This difference in designation highlights an inconsistency in how the Council interprets its own policy. Hence the Council should apply the Countryside around towns policy and withdraw this Business park development proposal.

10) Protection of Greenspace EP 11 (page 130)

The aim of this policy is to give protection to a wide range of defined types of green space (also known as 'open space') within settlements and to prevent their piecemeal loss to development particularly on the edge of towns.

The development BESH1001 would seriously threaten the greenspace within the Eshiels and Glentress area as one travels out of Peebles. Again, another example of the Council not following its own policies.

11} Green Networks Policy EP12 (page 133)

The aim of this policy is to promote and support developments that enhance Green Networks.

How is this proposal for a business park compatible with this policy when it would remove at a stroke approximately 5ha of green space?

This proposal will not extend and improve green network opportunities and links; it will have the directly opposite effect and destroy any such possibility. A further reason for rejection of this proposal.

12} Quality Standards Policy PMD 2 (Page 41). This policy 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 its landscape surroundings.

The development of BESH1001 would fly in the face of this Policy since it clearly will not be and cannot be integrated into the otherwise rural surroundings by virtue of its location.

I do not accept the argument that the proposed new site would integrate with the nearby existing council depot and recycling plant since these are down a hill to the south of the A72, a good 200m to the west of the proposed business park, and are out of sight from the road, now slowly being hidden by trees planted more than ten years ago. In contrast, BESH1001 would be in full view from the A72 clashing markedly with its rural surroundings.

13} Sustainability Policy PMD 1 (Page 40). This states that the Council will apply sustainability principles which will underpin all the Plan's policies. It includes numerous principles (paragraph 1.4) which the Council will adopt including:

- c) The protection of natural resources, landscapes, habitats and species.*
- h) The minimisation of light pollution.*

I feel development BESH1001 will totally contradict both paragraphs. With regard to paragraph 1.4 h) the minimisation of light pollution, any development of the business park would create significant light pollution. A business park would be illuminated 365 days per year throughout the hours of darkness. Currently there is no lighting in this area. This darkness is an aspect which further enhances the 'character of Eshiels' so clearly spelled out by Scottish Borders Council in their 'Settlement Profile' referred to at the start of this objection.

Hence, I wish to object in the strongest possible terms to the proposed development BESH1001.

Yours Faithfully,


Helen Swiers.