



Joe Nugent MRTPI
Planning Executive
Brownshore Management
M54 Space Centre
Halesfield 8, Telford
TF7 4QN
28 October 2020

Dear Duncan,

RE: 20/00809/FUL

**SITE: PHASE 4 STORE AND YARD ACREDALE INDUSTRIAL ESTATE EYEMOUTH
SCOTTISH, BORDERS TD14 5LQ**

PROPOSAL: ERECTION OF A SECURITY FENCE

1.0 INTRODUCTION

- 1.1 This letter is submitted in response to current discussion with the LPA relating to the development proposals at Phase 4 Store and yard, Acredale Industrial Estate, Eyemouth, Scottish Borders TD14 5LQ.
- 1.2 These matters have been set out in the letter dated 28 October 2020, via site visits by the agents, and associated discussions between the LPA and the applicant/developer.

2.0 DEVELOPMENT PROPOSAL

- 2.1 The development proposal has been discussed with the Case Officer and agreed to be updated to include the erection of a security fence and the change of use of land to commercial purposes.
- 2.2 Therefore the development proposal for the application is requested to be updated to:
- Change of use of site to business and industrial land with associated perimeter security fence.*
- 2.3 This proposal description details the development within the application, however if the LPA wishes to offer comment on making the description more precise this is welcomed.



3.0 LOCAL DEVELOPMENT PLAN

3.1 In order to review the development proposals a review of the relevant plannolicies of the Local Development Plan are required.

3.2 The Council’s website confirms that the Local Development Plan is the Scottish Borders Council Local Development Plan (2016). An update to the Local Development Plan (LDP2) is detailed on the Council’s website, however this is not stated to have progressed to formal review or adoption and limited weight is afforded to LDP2.

Policy ED1 - Protection of business and industrial land

3.3 Acredale Industrial Estate is allocated in Policy ED1 as a District Employment Site.

3.4 Policy ED1 sets a presumption in favour of the retention of industrial and business use on strategic and district sites, including new land use proposals for business and industrial land.

Policy zEL47 - Acredale Industrial Estate

3.5 The application site and surrounding land is wholly allocated in Policy zEL47 (Acredale Industrial Estate) of the Local Development Plan. Policy zEL47 (Acredale Industrial Estate) is allocated as business and industrial land safeguarding.

Policy ED1 and Policy zEL47 Summary

3.6 The application site and surrounding area is wholly allocated within the adopted Local Development Plan for business and industrial land uses.

3.7 These policy allocations wash over all the land in this area and do not separate business accommodation from highways and associated land. The areas are wholly allocated and there is no ambiguity on the areas allocated.

3.8 It is well-established and adopted within the Local Development Plan that the Acredale Industrial Estate is allocated as a District Site. In this instance the application site and the existing adjacent business accommodation are allocated as business and industrial land.

3.9 The change of use to business and industrial land for the application site is therefore not a change in its allocation of land use, it is a change in its current use within the adopted allocation. The land currently is land associated with the primary business and industrial land, the proposed development would utilise the site as primary business and industrial land.



- 3.10 The development proposals support the economic sustainability of an existing use at the industrial estate (Eyestore Ltd) and support their new land use proposal for business and industrial land. This directly accords with overarching aims of Policy ED1.

Policy PMD2 - Quality Standards

- 3.11 The aims of Policy PMD2 are to ensure that all new development is of a high quality and respects the environment in which it is contained. The policy does not seek to restrict good quality modern or innovative design, however it aims to ensure it does not negatively impact on the existing buildings, or surrounding landscape and visual amenity of the area.
- 3.12 The proposals support the principles of sustainability as the land is allocated for, and used for, business and industrial purposes. The proposals accord with Policy PMD2 f) in terms of providing hard and soft landscaping works to accommodate the storage uses, also the perimeter security fence is able to be treated to assimilate with the local environment and mitigate matters relating to visual amenity.
- 3.13 The proposals accord with Policy PMD2 h) to n) in retain the established character of the area; business and industrial land. The area is allocated for business and industrial land, the application site is not allocated for environmental or habitat purposes, the application site forms an intrinsic element with the existing industrial units and the industrial estate as a whole.
- 3.14 The scale and mass of the development (storage and distribution, and the security fence) are proportionate to the existing built infrastructure at the site (Eyestore Ltd) including security fencing and the storage of shipping containers and associated materials. In policy terms the development accords with, and is consistent with, Policy PMD2 k) as it is compatible with, and respects the character of the surrounding area, neighbouring uses, and neighbouring built form.

Policy PMD3 - Land Use Allocations

- 3.15 This policy confirms that development will be approved in principles for the land uses allocated within the Local Development Plan and the Proposals Map. The application site is allocated for business and industrial use, the development proposals fully accord with the allocated use of the Local Development Plan and the Proposals Map.

3.16 The development proposals and distribution and upon each other for the maintains the established principle of development is established by Policy



are intrinsic to each other (storage perimeter security fence) and rely purposes of the land use. The use use at the industrial estate and the

4.0 VISUAL AMENITY

- 4.1 It has been noted that the Case Officer has raised potential concerns relating to the effects upon visual amenity from the development. This section of the letter offers a response to these concerns and potential measures of mitigation.
- 4.2 A material consideration is that the land is allocated for business and industrial use, the application and development are for business and industrial use.
- 4.3 In terms of the landscape character this is established by the industrial estate and the allocated business and industrial uses both at the application site, the adjacent sites and the wider industrial estate.
- 4.4 In terms of visual amenity this is broadly limited to a short section of the Core Path passing the western section of the application site. It is stated that it is limited to a short section (approx 100m) of the Core Path as established screening is present to the North and to the South of the application site and receptors (walkers, runners, cyclists etc) do not observe the site.
- 4.5 Therefore an assessment of the potential effects on visual amenity are limited to a distance of approximately 100m.
- 4.6 The assessment of this route and distance is the established landscape character, this is established at a plan level by the proposals map that illustrates the Core Path travelling through an allocated industrial estate used for business and industrial uses. Therefore is it reasonable to accept the established and future land use, and therefore the landscape character, is that of business and industrial.
- 4.7 The proposed development would utilise land closer to the Core Path than the existing units at this location. However, comparatively the units opposite (West) the application site are in proximity to the Core Path and at a similar distance as is proposed in this application.



- 4.8 The proximity of the use of the land is relevant use of the route has been and is variable on selected perimeter security fence and the to the use of the Core Path. The monitored across a 3 day period days and variable with the weather conditions. Users in a working day (9-5) of the Core Path at this location have been observed as ranging from 2 to 18, this gives an average of 10 users per day.
- 4.9 These users have experienced the 100m route as an established part of the industrial estate both in its land use and landscape character. The development of the site does not introduce a new land use, it increases the established land use at Eyestore Ltd that users of the Core Path have experienced when passing the site.
- 4.10 In planning terms and in terms of landscape assessment it is considered that the users (receptors) of the Core Path at this location have for a significant time experienced a landscape character that is prominent in its business and industrial character. The development of the site does not introduce a new land use, it increases the established land use at Eyestore Ltd.
- 4.11 The potential for effects on visual amenity are therefore considered as limited as the land use is established and this assimilates with the wider industrial estate and the industrial character of the landscape.
- 4.12 It is recognised that the metalised (silver) finish of the security fence along the Core Path could be refinished to reduce the current finish. In terms of mitigation it is proposed that the perimeter security fence (along the Core Path) could be treated (painted) using an agreed RAL Colour and therefore reducing the current metalised colour.
- 4.13 Additional mitigation measures may be considered where they are discussed and mutually acceptable between the LPA and the applicant. Early discussions are invited.

5.0 CONCLUSION

- 5.1 To offer a conclusion, the application site is allocated within the adopted Local Development Plan for business and industrial land uses. This application seeks to allow for the expansion of an existing use at the industrial estate.
- 5.2 The expansion of an existing business and industrial use at this location is directly supported by policies of the Local Development Plan. Additionally, this form of development supported the economic sustainability of the existing business and their supply chain in terms of their increased requirement for business and industrial land.

5.3 In terms of the potential for established that the Core industrial estate and reflects the business and offer mitigation for users of the Core Path, discussion with the LPA are invited to agree a RAL Colour for the perimeter security fence where it is in proximity to the Core Path.



effects on visual amenity it is Path travels through an allocated therefore the landscape character industrial uses at this location. To

5.4 It is therefore requested that the LPA support the application and a positive accommodation is supported.

Kind regards,

Joe Nugent