

16<sup>th</sup> September 2021

The following note provides a response on behalf of Verdant Leisure Ltd. (the 'Applicant') to the public comments received on the application, including from Cockburnspath Community Council. At the time of writing, responses from four members of the public and one from the Community Council have been logged.

These comments have been reviewed and broadly cover the following topics:

- Highways impacts and access;
- Landscape and Coastline impacts;
- Biodiversity impacts;
- Economic benefits;
- Flood risk and drainage issues; and
- Residential amenity.

Respondents, including the Community Council, have noted the site's planning history and that previous applications have been withdrawn (application ref: 18/01041/FUL) and refused by the Council previously (ref: 19/01709/FUL). This current application has sought to address the reasons for refusal relating to drainage and landscape impacts and should be considered on its own merits. The Planning Statement that accompanies the application provides full details of how this proposal addresses previous concerns and issues.

### **Highways Impacts and Access**

Within this broad topic area, respondents made comments relating to the following aspects:

- Pease Bay Road is unsuitable to accommodate additional traffic movements;
- There are a lack of pavements along the route, which could impact user safety, including pedestrians and cyclists;
- Verges being eroded and the general condition of the roads being unsuitable;
- Speed of traffic; and
- Questioned the route of construction traffic and noted roads would be unsuitable.

While the concerns of the community are noted, the Council's Roads Department have stated they have no objections to the proposed development in principle. They did, however, request additional information with regards to gradients within the site and the inclusion of crash barriers – this information was provided by the Applicant to the Council on 24<sup>th</sup> August 2021. No further response has been received to date and the Applicant considers that this issue has been resolved. We note that the Council did not raise any of the concerns highlighted above.

Additionally, we note that Transport Scotland also responded to the application on 8<sup>th</sup> July 2021 and had no objections on the proposed development.

Pease Bay Road is a public road and as such the maintenance is the responsibility of the Local Highway Authority.

With regards to the construction traffic, we note from the comments from the Community Council that the route from the south is considered to be unacceptable. The route for construction traffic will form part of a Construction Management Plan (CMP), which we proposed to be secured by planning condition on the decision notice. The CMP will consider the level of construction traffic and set out the construction routes. As a planning condition this will need to be approved by the Council in consultation with the Council, stakeholders and the public.

### **Landscape and Coastline Impacts**

Respondents have cited that proposed development is contrary to Policies EP5 (Special Landscape Areas), and EP14 (Coastline) and that it would have a detrimental impact on the Berwickshire Coast Special Landscape Area ('SLA').

The application is accompanied by a Landscape and Visual Appraisal (LVIApp) which has been prepared by a suitably experienced and qualified professional. A Landscape Plan and Planting Schedule also accompanies the application which sets out in detail, mitigation measures which would be incorporated within the proposed development, such as increasing planting.

Policy EP5 allows for development which result in significant adverse impacts to be permitted where there are social or economic impacts of local or national importance. Policy EP14 states that development will only be permitted in specific areas in the designated Coastline area, the proposal is appropriate under Local Development Plan policies or where the benefits outweigh the damage to the landscape character.

Notwithstanding that the proposed development would result in economic benefits, the LVIApp clearly concludes that, with the implementation of mitigation measures, the proposed development would have a negligible impact on the SLA and would therefore not conflict with the Council's adopted policies.

Additionally, in terms of principle of the development, Policy ED8 specifically names Pease Bay as a main caravanning and camping site in the plan area. The application site is adjacent to the existing Pease Bay Holiday Park and therefore, the principle is acceptable.

Comments from the Council's Landscape Officer are yet to be received on the application; however, the Applicant has worked hard to address issues previously raised in historic application on the site. The additional measures and changes taken are set out in the submitted LVIApp and in Section 5 of the Planning Statement. The conclusion of the submitted LVIApp is that there will be no impacts to landscape with the inclusion of mitigation measures.

### **Biodiversity Impacts**

Comments received have set out that the application site contains gorse and other vegetation which would be removed as part of the proposed development. Whilst the Applicant accepts there will be a loss of some of these features, the proposals, especially the siting of the lodges and the approach to the levels of the terraces, have been carefully designed to minimise the need for excavating the hillside, thereby aiming to maximise and retain as much of the existing vegetation as possible.

Additionally, the proposed development is accompanied by a Landscape Plan and Planting Schedule which mitigates for the loss of existing vegetation and increases the overall vegetation cover. Any replacement vegetation will be a native species appropriate to the location and which is characteristic to the area.

The choice of the Gravitax-flex MSE system as a retaining wall will also allow for a variety of vegetation to be seeded and grow along it (refer to submitted Landscape Plan and Planting Schedule for details), which will also help improve biodiversity and offset any loss of vegetation.

The Council's Ecology Officer has been consulted on the application but have not provided any feedback at the time of writing. Whilst this application would be decided on its own merits, we would like to point out that the previous refused scheme did not have any objections subject to the inclusion of planning

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conditions. Given enhanced landscaping and planting measures are included in this application compared to the previous one, we consider this to not be an issue.

#### **Economic Benefits**

Comments received in this broad topic area have mainly stated that the proposed development will not result in any economic benefits to the local area and the employment generated from the proposed development is not beneficial.

Respondents also stated that that visitors to Pease Bay are actively discouraged from using local services. It is correct that the existing holiday park contains a range of services, including an on-site shop. The services provided are typical for developments of this type and are provided in line with guest expectations. Guests staying on the existing leisure park are free to utilise facilities on and off-site with no restrictions.

The Applicant is an award-winning company who operate a number of holiday and leisure parks in the north of England and in Scotland, including two other leisure parks in the Council's plan area. The figures stated with regards to additional employment generated is based on years of experience of operating Pease Bay and the other premises.

As set out in the application submission, it is expected that the proposed development will create the equivalent of 3.5 full time jobs, with the potential for additional jobs to be created at times of peak demand. Different forms of employment types and tenures will suit different persons, and the types of employment which would be generated from the proposed development are typical to the hospitality sector. Despite the comments made with regards to the merit of the jobs being created by the proposed development, the creation of jobs classes as economic development, and the proposed use supports tourism in the area which is recognised as key sector at a local and national level. Given the sectors recognised importance, it also forms a key sector for the post-Covid 19 economic recovery.

The Applicant has seen significant demand for stays at the holiday park and at other holiday parks they operate. The expansion of the park is crucial in the post COVID-19 period and in responding to this increased demand.

We are aware the Council have contacted their Economic Development Team for their view on the proposed development, however, they have not provided anything at the time of writing. We note that the Economic Development team did respond to the previous application where they broadly supported the proposals.

#### **Residential Amenity**

Respondents stated that the proposed development would impact the amenity of nearby residential dwellings. This is with regards to visual amenity (particularly from Old Linhead), impacts of noise from traffic and privacy.

The site has been designed to include landscape mitigation measures which will effectively screen the site from key views. It is accepted that this may take some time to implement, however the measures as shown on the Landscape Plan will have to be adhered to should the plan be included on the approved drawings list on the decision notice. The topography of the area means that the proposed lodges would be situated below the level of Pease Bay Road., which would also help screen them from public views.

Noise levels are not anticipated to be materially increased during the operational phase of the proposed development. The Construction Management Plan (CMP) will set out measures and controls to be used during the construction period to minimise and mitigate any impacts. As set out above the CPM will be secured by a planning condition. The Council's Environmental Health Officer has been consulted on the

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application but have not responded or provided any feedback at the time of writing. We do note that no issues were raised in the previous application.