

Supplementary Planning Statement

Business Unit at Duns Road Industrial Estate

Duns Road, Greenlaw, Berwickshire, TD10 6XJ

Planning Reference 22/00032/FUL

Introduction

Submission of planning application 22/00032/FUL stimulated a number of queries that are summarised in an e-mail sent by SBC case officer Julie Hayward on 20th April. Her list of topics is as follows:

- Review of planning policy
- Site photographs
- Amendments to details of proposed building and Site Plan
- Landscape plan, planting, screening and SUDs pond
- Noise assessment.

These are addressed in turn below.

1. Planning Policy

Planning permission 98/01057/OUT authorised a similar workshop on this site, plus an adjacent house for the proprietor. That consent was granted to Mr Smillie of Border Embroideries. He eventually bought a house in The Avenue and built his unit behind, on what had previously been the yard of Henry Steel & Son (builders) and is now the industrial estate, and allowed the permission to lapse. The embroidery enterprise has grown to fill the estate and has a staff of about 50. The current application wakes up the expired and dormant permission (albeit without the dwelling). It is supported by Border Embroideries ... without that support it would not be possible to propose use of the existing access into the industrial estate.

The Local Plan provided opportunities for commerce at the Duns Road Industrial Estate (employment site zEL22) and at mixed-use site MGREE003, both at the north end of Greenlaw, accessed from the A6105. Both these sites are fully taken up. Border Embroideries occupy the whole of the former plus half the latter; the balance is the subject of an application for residential development. The proposal relates to a plot of land adjoining to the north, which is mostly outside Greenlaw's development boundary.

This takes us to Local Plan Policy PMD4. This policy confirms developments should be contained within development boundaries unless one of the exceptions applies, as in this case ... this is a job-generating development with an economic justification under Policy ED7. Before looking at Policy ED7 it should be noted that Policy PMD4 requires exceptions to (i) be a logical extension of the built-up area; (ii) be of a scale appropriate to the size of the settlement; (iii) not to prejudice the character and cohesion of the settlement edge; and (iv) not to cause significant adverse effect on the landscape setting or natural heritage of the area. The current proposal easily clears these hurdles. In addition, consideration must be given to its influence on the long-term settlement profile; the cumulative effect of developments outwith the development boundary; and the impact on infrastructure and the service capacity at Greenlaw. As the town has service capacity and desperately needs more economic activity, and because the proposal is well-sited and there is no other development contributing to a cumulative effect, these strands of Policy PMD4 present no obstacle to the proposal.

Policy ED7 is principally concerned with developments required for agriculture and forestry where they are outside development boundaries, but it has a strand supporting other business or employment-generating uses where there is an economic and/or operational need for a location outwith a development boundary and they cannot reasonably be accommodated within the development boundary. This exactly describes the current proposal. The proposed workshop is for G&J Waddell, whose letter of 18th March gives full details of their history and their need for a new workshop in the town.

Part (a) of Policy ED7 requires that the development respects the amenity and character of the surrounding area. Revised plans and a landscape plan attached to this supplement ensure that this is the case. The workshop will be similar to, and adjacent to, the existing workshops of Border Embroideries; and the applicant is committing a significant area to new tree planting ... including a new public path safely behind the roadside hedge. The landscape plan and 3D imagery show that the landform is to be adjusted slightly to provide a flatter footprint for the building, with a planted bank behind.

Part (b) of the policy requires that there is no significant impact on nearby uses, particularly housing. Support from Border Embroideries indicates there is no significant impact on them, which takes care of the south and east. To the north, the nearby use is agriculture, to be substituted by woodland, which will not suffer any significant impact. The proposal does not impact on housing over the road, which is screened by their hedges quite apart from any planting proposed in association with the workshop. There is potential to impact on Clay Dub cottage. The design and layout take account of this possibility and do not affect its prospect or light. Noise readings supplied in a separate part of this supplement demonstrate that the cottage will not be affected by noise. In any case, the dominant noise at the site is from traffic on the A6105 and the cottage faces directly onto this road.

Part (c) of the policy supports proposals for business development outside settlement boundaries where they provide employment and there is an economic and/or operational need to use the location, there being no reasonable alternative within the settlement. This is exactly the case here. G&J Waddell Ltd employs 12 joiners plus support staff, 17 in all. This is broken down into five site joiners, four manufacturing joiners (including the younger director), two labourers, one self-employed joiner and three apprentices – 1st year, 2nd year and 3rd year. In the office there are two part-time staff (counted as one full-time) and Kenny Waddell at the head of the firm. Expansion at the new workshop will allow three more manufacturing joiners, three more apprentices (manufacturing as opposed to site joiners), a yardman, a storeman and a driver, another full-time admin person in the office and part-time positions for an estimator and a cleaner. Counting the part-timers as one, the immediate potential is eleven new jobs. There is, of course, also potential to expand the site team and the use of subcontract labour. The firm is currently a main contractor on four sites; the move would provide capacity for this to increase, which would create the additional full-time post of a site foreman. I think it is fair to compare the business to a compressed spring, one that will immediately expand when given the opportunity. In addition, the grant of planning permission will release the current workshop to another enterprise, so the total number of jobs created could be as many as 30.

For completeness, other criteria taken into account by Policy ED7 are: impact on landscape and amenity – which are dealt with above in connection with Policy PMD4; whether a brownfield site is available for the new workshop – and there isn't one; consequences of expansion or intensification of current activity on the site – which is not proposed; and compliance with Policies PMD2 [Quality Standards] and IS4 [Transport Development and Infrastructure] – which we believe are properly met by the proposals.

In answer to the Case Officer's questions:

- (i) The firm of G&J Waddell is based in two-storey offices at Eastbank, East High Street, Greenlaw, TD10 6UF. The firm principally offers site joinery but requires stores and a workshop for making items such as windows and doors. In recent years its workshop has been at Eccles, TD5 7QS, lying between Olivers Transport and the former Forsyths garage. The business needs to relocate its workshop because it has outgrown that space (see separate schedule of photographs). When Forsyths closed, about a year ago, the business tried to buy the bigger unit next door but was outbid. The directors have searched over several years to find premises that will allow expansion. The situation has now become pressing; apart from organic growth, the next generation has entered the business with ambitions for growth through diversification, notably building staircases, kitchens and garden structures ... all of which need space.
- (ii) For several years the business has been looking for local premises that will allow expansion. It has tried to find space at the Old Station in Greenlaw, which has been and remains consistently full; at The Moat on Marchmont Road, which is steadfastly not

available; and at the Poultry Unit on Marchmont Road, which is to be redeveloped as a mix of residential and arts-based workshops, so is not available. Back in 2013 the business tried to relocate to allocated site MGREE001, but the planning application (reference 12/01383/PPP) was refused for visual impact. The directors have run out of options. If this application is refused **their only other choice is to reduce the number of joiners and other staff** so that the younger generation can use the available space for making a few of the larger joinery items in the current workshop.

- (iii) The options made available by the council's Economic Development Section have not included anything in Greenlaw. The directors of the business realise that opportunities occasionally arise in Duns or Kelso and further afield, but this is a Greenlaw business with Greenlaw staff and a local clientele. They have explained this repeatedly; Members of the Council who know of their difficulty include John Greenwood and Mark Rowley, both of whom support the current proposal.

2. Site Photographs

A schedule of photographs is provided in a separate document within this supplement. These show, *inter alia*, the access and the site's relationship with Clay Dub cottage.

3. Amended Details of Proposed Building and Site Plan

Amended site and building plans are provided in separate documents within this supplement. These show the 15 parking spaces, details of surface materials, existing and proposed levels, and the finished floor level of the building. It will be noted that revisions include cladding the entire building in insulated grey profiled metal sheeting to match the adjacent units, no exposed brick or block remains. The roof is still asymmetric; its shape does not influence the ridge height – it optimises the area available for solar panels.

4. Landscape Plan, Planting, Screening and SUDs Pond

A landscaping plan and 3D images are also supplied as separate parts of this supplement. These were not available at the time of the original submission because of the time needed to make a topographic survey and to edit it to show the desired cut-and-fill, and to superimpose the landscaping and planting proposals, and a SUDs pond. This work has been done and the new images show the considerable care taken to ensure good screening, notably the northern and western sides and against the road. From the south-west, the landscaping and planting will provide a natural backdrop within a few years of establishment. This is work the applicant will do, having the appropriate skill set; the landscape area will not be sold to G&J Waddell. It will be noted that the applicant has included a second hedge against the A6105, thereby providing a safe path for walkers and cyclists.

5. Noise Assessment

Finally, a noise assessment is provided as a separate part of this supplement. In brief, it shows the full complement of woodworking machinery – including dust extraction and a radio – produces considerable noise in the joiners' existing workshop ... but is barely audible above background noise outside, despite scant sound insulation compared with that proposed. The background noise level at the site is around 20% lower than at the current workshop until a vehicle passes along the A6105, whereupon it becomes around 20% louder. In any case, the study confirms the nearest neighbours – Clay Dub Cottage and Borders Embroidery – will be unaffected by noise nuisance caused by the proposal. As an added precaution, the workshop doors open to the north and east, where there are no neighbours.

Traffic movements at the existing workshop are twelve vehicles in the morning rush hour (07.30 to 08.30) and an average of another twelve through the day, Monday to Friday, with only occasional traffic at weekends. This is nearly all vans; on the average there is one lorry delivery per day, which might be either rigid-bodied or articulated. Although light, it is enough to cause congestion and a hazard each morning. This level of traffic will transfer to the new site and will grow with the number of jobs, so could be half as much again within a year or two of the transfer. This level of traffic will not cause any hazard or congestion at the new site because its access is directly from the A6105 and the proposal includes plenty of space for parking and turning.

Summary

We are satisfied that this proposal for a new joiners' workshop adjacent to and sharing access with the Duns Road Industrial Estate, which will increase local employment thereby contributing to the local community and economy, merits support. It is well conceived, well designed, well landscaped and appropriately screened. It will not adversely affect neighbours or the environment and will not materially add to traffic. It is in line with the Scottish Borders Local Plan, and we commend it to the Planning Department at Scottish Borders Council.

Prepared by:

A H Garratt LL.B FRICS FAAV



The Guildhall, Ladykirk, Berwickshire, TD15 1XL

Tel: 01289 382209

E-mail: ahg@smithandgarratt.com