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From: [REDACTED]

Sent: Fri, 15 Jan 2021 19:53:04 +0000ARC

To:

Subject: AHSS Comment on Local development plan (proposed) / LDP2: Netherbarns

Sensitivity: Normal

Attachments:
[REDACTED]

CAUTION: External Email

Dear Forward Planning,

Please find attached a letter written by members of the Forth & Borders Cases Panel concerning the designation of Netherbarns as housing in LDP2.

Yours,

[REDACTED]





Speaking for Scotland's Buildings

13th January 2021

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

RE: Local Development Plan 2 / Abbotsford House and Netherbarns, Galashiels, Site Code AGALA029

We have been alerted by press coverage and concerned members of the Architectural Heritage Society of Scotland (AHSS) to the proposal to allocate the site identified as Netherbarns, Galashiels, Site Code AGALA029, to housing for 45 units. This will be a new allocation. We are surprised that this is within the proposed housing allocation in the LDP as the site has in the past been the subject of other applications for housing which have been rejected at planning inquiries.

This site is a south facing slope on the opposite bank of the River Tweed to the category A listed Abbotsford House (LB 15104) and the Abbotsford House designed landscape (GDL0001). It is an important part of the outward views from Abbotsford House and grounds, across the Tweed. This is emphasised in the 2017 Abbotsford Estate Conservation Management Plan by Peter McGowan:

'The view of the Netherbarns' bank and hillside is an outstandingly important part of the setting of Abbotsford and needs to be protected from intrusive development'.

We do not believe that it would be possible to mitigate the intrusive effect of a development of 45 suburban houses on the hillside. At present when visitors to Abbotsford look out from the house they see a rural hillside on the farther bank of the Tweed, and can imagine themselves seeing the view that Sir Walter Scott enjoyed.

We consider that the proposed use of this Netherbarns site for housing does not comply with clauses 135-137 of Scottish Planning Policy 2014 (December 2020 revision) which we quote as follows:

Valuing the Historic Environment

NPF and wider policy context

135. NPF3 recognises the contribution made by our cultural heritage to our economy, cultural identity and quality of life. Planning has an important role to play in maintaining and enhancing the distinctive and high-quality, irreplaceable historic places which enrich our lives, contribute to our sense of identity and are an important resource for our tourism and leisure industry.

136. The historic environment is a key cultural and economic asset and a source of inspiration that should be seen as integral to creating successful places. Culture-led regeneration can have a profound impact on



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the well-being of a community in terms of the physical look and feel of a place and can also attract visitors, which in turn can bolster the local economy and sense of pride or ownership.

Policy Principles

137. The planning system should:

- promote the care and protection of the designated and non-designated historic environment (including individual assets, related **settings** and the wider cultural landscape) and its contribution to sense of place, cultural identity, social well-being, economic growth, civic participation and lifelong learning; and
- enable positive change in the historic environment which is informed by a clear understanding of the importance of the heritage assets affected and ensure their future use. Change should be sensitively managed to avoid or minimise adverse impacts on the fabric and **setting** of the asset, and ensure that its special characteristics are protected, conserved or enhanced.

We also consider that the designation of the Netherbarns site for housing does not align with the Council's own proposed policy EP8 on page 120 of Volume 1 of the draft plan, namely that

'setting is considered to be important to the way in which historic assets are understood, appreciated and experienced both **inwards and outwards**'.

We have highlighted the words 'setting' and 'inwards and outwards' in the three paragraphs above as we object to the inclusion of the site for housing.

Both Abbotsford and the Netherbarns site lie within an area long-recognised as a major landscape asset. Originally denoted as an 'AGLV' (*Area of Great Landscape Value*), following a review of local landscape designations the area is now the **Tweed, Etrick and Yarrow Special Landscape Area**. The Designation Statement in Scottish Borders Planning Guidance on Local Landscape Designations, approved in 2012, states:

'The valley sides running east form a major part of the setting of Galashiels, Tweedbank and Melrose. A series of estate landscapes give visual diversity to these valleys, including Abbotsford,...'

Forces for change. (include) Development pressure at the edges of Galashiels and Selkirk.

Management recommendations: Consider the landscape and visual impacts of proposed developments in and around settlements.'

In SPP 2020 (para 197) planning authorities are encouraged to limit non-statutory local designations to areas designated for their local landscape or nature conservation value. Designating an area of value should be to

- safeguard and enhance the character and quality of a landscape which is important or particularly valued locally or regionally; or
- promote understanding and awareness of the distinctive character and special qualities of local landscapes; or
- safeguard and promote important local settings for outdoor recreation and tourism.

We consider **all** these purposes relevant to this case. We also note that in recent guidance on Designating Local Landscape Areas (Historic Environment Scotland and NatureScot 2020), a selected case study is the 'Scottish



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Borders Council LLA Review - Cultural and Historic Landscape Associations' (p.28) and their Policy EP5, (LDP 2016) is cited in Annexe 4 (p. 52) as a model example whereby

'the Council will seek to safeguard landscape quality and will have particular regard to the landscape impact of development, including the visual impact.'

It is essential that there is no development of a suburban nature on this ground at Netherbarns because of the detrimental impact on the setting of Abbotsford House and outward views from it. Such development will be intrusive and damaging to the work carried out at Abbotsford House and in the grounds by the Abbotsford Trust and its partners, including the Council and local volunteers, and to the enjoyment of visitors from a wide range of places.

Abbotsford is one of the Scottish Borders' premier visitor attractions, and visitor numbers have significantly increased since the introduction of train links to Tweedbank. Since the new visitor centre was opened it is (Covid-19 aside) essentially a year-round attraction and the role of trees in mitigating views of any new housing is irrelevant as the deciduous cover would not be there in the winter. Neighbouring development to Netherbarns is hidden from Abbotsford by their different elevations, and by existing planting on the Abbotsford estate, neither of which apply to Netherbarns, and thus simple linear distances are unhelpful in calculating impact.

We strongly recommend that Scottish Borders Council support the stated aim of policy EP8 which is 'to give historic environment assets strong protection' by deallocating site AGALA029 for housing.

We also urge the Council to identify brownfield sites close to public transport within Galashiels for housing use.

Yours faithfully,

[Redacted signature block]