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**From:** [REDACTED]

**Sent:** Sun, 17 Jan 2021 12:59:29

**To:**

**Subject:** Proposed Local Development Plan 2020 - Consultation response re ADARN005 & Darnick Future Expansion - Andrew Panter

**Sensitivity:** Normal

**Attachments:**

[REDACTED]

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**CAUTION:** External Email

Please find attached my response to the Proposed Local Development Plan 2020 with regard to:

1. ADARN005 Darnick housing allocation.
2. Darnick Preferred Areas for Future Expansion

Yours

Andrew Panter



16 January 2021

The Forward Planning Team  
Corporate Improvement and Economy  
Scottish Borders Council  
Newtown St Boswells  
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TD6 0SA

Dear Sir/Madam

**PROPOSED LOCAL DEVELOPMENT PLAN CONSULTATION 2020**

- 1. Response to Housing Allocation ADARN005 Darnlee, Darnick**
- 2. Response to Darnick Preferred Areas for Future Expansion (Darnick Site Profile)**

I hereby wish lodge an objection to the inclusion of the above housing allocation in the Proposed Local Development Plan 2020 (PLDP). I also object to the reference in the PLDP Darnick Settlement Profile for Preferred Areas of Future Expansion, which is immediately adjacent to the above allocation. The following comments include reference to both.

**1. Darnlee ADAR005**

**Summary**

Building allocation ADARN005 would present significant issues for:

- the principal gateway approach into Darnick
- the Eildon and Leaderfoot National Scenic Area special qualities at a settlement level.
- the Darnick Conservation Area traditional and historical built elements
- cumulative development
- open space/green space
- general biodiversity
- existing trees and woodland
- archaeological/historical interest – battle site
- roads/traffic - movement and congestion

**Landscape, Design and Placemaking**

**Village approach**

The housing allocation is located almost immediately at the main entrance to Darnick. This village gateway presents a positive point of arrival, with a clear and immediate sense of character and settlement identity, which is a key principle of placemaking, and design set out in the SBC Placemaking and Design Supplementary Planning Guidance 2010<sup>1</sup> (PD SPG).

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<sup>1</sup> SBC 2010 Placemaking and Design Supplementary Planning Guidance (4.3, p32)

Of the four approaches/entrances to Darnick, the Waverley Road 'gateway' provides for the most significant reveal of predominantly traditional stone – houses/walls, the open parkland of Darnlee, mature roadside trees on the southern edge, and the western woodland strip. Any development in this location would detract significantly from the approach experience and settlement character. The other settlement entrances present limited arrival impact and sense of place. This entrance is an essential introduction to the historical core of the central village.

### **Eildon and Leaderfoot National Scenic Area (NSA)**

The NSA has 14 special qualities<sup>2</sup> including *'The hub of Border settlement'*, which *inter alia*, states that *"Stone is the traditional building material, a mixture of dark Silurian greywackes and ruddy Old Red Sandstone (reflecting the location of the towns astride a geological boundary)"*. Darnick still retains its traditional stone character amid a plethora of more modern construction design. Continuation of departure from that traditional element of quality, further erodes that context of the NSA at a local level within the settlement. This in turn contributes to the broader, landscape scale attrition of special qualities which the NSA has been subject to in recent decades. The NSA special qualities also include *'A richly wooded scene of great variety'* - see the section on trees below.

In general, developments within settlements may not appear to have negative impacts on the overall character of an NSA, but cumulative impacts over time, gradually degrade the defined special qualities. Policy EP4 National Scenic Areas of the PLDP allows for development effects on NSA where these are *"...clearly outweighed by social or economic benefits of national importance."* That importance is accepted for housing land allocation within the Central Strategic Development Area but given the small size of this allocation and the range of significant issues presented, I would consider it highly reasonable in this case for it not to be outweighed by broader social or economic factors. Depending on the interpretation of 'social' in that context, it can be argued that there is social benefit locally from having no development.

### **Conservation Area (CA)**

Darnlee lies within the Darnick CA. The CA Statement<sup>3</sup> emphasises the elements of the historic core of the settlement, referring to the organic nature of build design and materials, where *"Traditional building materials prevail...as well as many architectural details...Other details that are commonly found are stone boundary walls and skews. It is recommended that any alterations or new development...should have regard to these elements and so contribute to the retention of its character."* These principles endorse those of the NSA special quality referred to above. Rather than retaining character, any development at this location would significantly diminish it.

### **Development cumulative impact**

Darnick is a relatively small settlement that has already been subject to four similar sized infill developments in the last 20 - 25 years, *viz.* Fisher's Lane/Lady's Walk, Waverley Gardens, Gilroy Gardens and Coat Burn Green. In other parts of the village there have been several phases of more extensive development from the 60s onwards. It is entirely reasonable to consider that Darnick has made sufficient in-fill contribution of units to the Housing Land Requirement. In this context I would argue that 10 units could easily be

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<sup>2</sup> Scottish Natural Heritage (2010). The special qualities of the National Scenic Areas. Scottish Natural Heritage Commissioned Report No.374 (p42 *et seq*, p46)

<sup>3</sup> Conservation Area Statement [https://www.scotborders.gov.uk/directory\\_record/25985/darnick](https://www.scotborders.gov.uk/directory_record/25985/darnick)

accommodated elsewhere locally, especially within large land allocations such as Lowood (MTWEE002), with an indicative capacity of around 300 units, and the 14 allocations in Galashiels with an indicative capacity total of 947 units, irrespective of whether these can be completed within the life of the PLDP.

The PLDP Placemaking and Design policy PMD5 (1.4), refers to Scottish Planning Policy which states that *"SPP...supports the principle that settlements must be able to absorb and sustain the individual and cumulative effects of infill development and care must be taken to ensure that no over-development takes place."* I would contend that the proposed development would indeed constitute over-development, even without consideration of all other comments made here, and when read against relevant Infrastructure and Economic and Housing Development policies.

### **Open/Green space**

Darnick village has (virtually) no central open space within the settlement boundary in the sense of a village green, but a very small open area across from the village hall does provide some degree of open aspect. Although the Darnlee allocation site is not open to public access or use, and is peripheral in the settlement, the parkland contributes significantly to the sense of place and visual appreciation of this northern approach to the village. This is enhanced by the wooded play-park area opposite Darnlee, east of the main road. The Shunters Wood Community Woodland, immediately to the west of the allocation, is also peripheral but outwith the settlement boundary.

Policy EP11 Protection of Greenspace indicates that greenspace within the settlement boundary will be protected if it can be justified by its environmental, social, or economic value, or by *"...the role that the greenspace plays in defining the landscape and townscape structure and identity of the settlement..."*. I would contend that this open/greenspace can be justified against all these, except economic value.

### **Design standards**

The three recent developments, referred to above (Cumulative development) demonstrate limited attempts at design enhancement with more traditional elements in the village. One of those, Waverley Gardens, is, peculiarly, included in the Conservation Area. This does not inspire confidence that rigorous enhancement design would be applied in the case of the current allocation. The PD SPG<sup>4</sup> provides extensive recommendations regarding design principles, process and achievement which are rarely rigorously applied.

## **Biodiversity**

### **General biodiversity**

In terms of the Darnlee parkland west woodland fringe and south roadside trees, there are no known species of national or regional rarity, although protected species are currently either present or transient. The grazed grassland, woodland and roadside trees support a range of common plant, mammal, bird, and invertebrate species. The west woodland edge is contained within the allocation boundary, suggesting the strong likelihood for removal. All individual trees and woodland have significant biodiversity value in general, particularly as green networks, providing continuity with the wider countryside. Although these habitats may not currently be described as 'species rich', left undisturbed they obviously have the

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<sup>4</sup> [https://www.scotborders.gov.uk/downloads/file/930/placemaking\\_and\\_design](https://www.scotborders.gov.uk/downloads/file/930/placemaking_and_design)

potential to naturally acquire greater diversity over time. Policy EP6 Local Biodiversity and Geodiversity aims “...to avoid fragmentation or isolation of habitats,...”. Although there is allowance for compensatory biodiversity offsets, there is little scope within Darnick for any such net gain, ie. loss to the village.

### **Trees**

Existing mature oak, sycamore and holly occur on the south edge of the allocation against Broomieles Road. The west edge woodland strip of predominantly mature Scots pine and beech is contained within the allocation. All these trees make a significant contribution to biodiversity, visual appeal, and carbon storage. Given the size of the allocation, the proposed, relatively small indicative capacity, and the potential for the creation of a southern access road, it seems likely that a high proportion, of woodland and individual trees would be removed if the site were developed. That potential loss also needs to be viewed in the context of other recent or planned future instances of extensive tree felling in the local area (see below – 2. Preferred Areas etc. – Woodland)

## **Archaeology/History**

### **Battle site**

The Inventory of Historic Battlefields<sup>5</sup> maps the Battle of Darnick or Skirmish Hill over a large area covering the whole of Darnick with Darnlee almost at the centre. This indicates uncertainty about precise locations of the engagement. If James V was supposed to have watched events from the top of Darnick Tower, it seems most likely that action took place in the immediate vicinity, including Darnlee. Deployment of forces information gives some indication of that. Unless Darnlee has been subject to detailed archaeological assessment in the past, a new survey would be necessary to protect any significant identified historical features.

## **Infrastructure**

### **Roads/traffic**

There is a suggestion of creating a secondary access from the allocation onto Broomieles Road. It is hard to see how this could be achieved without a) removal of mature roadside trees and b) widening of what is, at that point, a single-track road. Both would contribute hugely to the impact on settlement character.

It is suggested that displacement main road parking would be accommodated within the allocated site. The indicative capacity of 10 units would potentially result in on-site parking for an additional 20 vehicles or more. Parking on the main road has recently been gradually extending further towards the village entrance, contributing to congestion, exacerbated by through-traffic accessing the rear of the hospital. Main road parking is therefore likely to increase from visitor/service vehicles to such a development, as well as increasing the current difficulties of access to and egress from Broomieles Road. Previous development at Gilroy Gardens has already resulted in an increased contribution of vehicle movement, compounded by sight-line problems for egress traffic onto Abbotsford Road.

## **2. Darnick Preferred Areas for Future Expansion**

### **Summary**

Many of the above issues discussed also apply to any future development proposals on the land to the west of the Darnlee allocation, and would present significant issues for:

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<sup>5</sup> [http://data.historic-scotland.gov.uk/data/docs/battlefields/darnick\\_full.pdf](http://data.historic-scotland.gov.uk/data/docs/battlefields/darnick_full.pdf)

- woodland habitat
- recreation and amenity
- settlement boundary
- development cumulative impact
- settlement coalescence and countryside around towns

### **Woodland**

Reference is made at the end of the Darnick Settlement Profile in the PLDP, to preferred future expansion into an area immediately west of the ADARN005 allocation. This area is currently developing woodland habitat of the Darnick Community Woodland which is owned by the Council and subject to two management agreements covering two land areas, concluded between the Council and Borders Forest Trust (BFT). Both agreements run until 2034. The woodland is managed by a community group, supported by BFT.

This therefore presents the future potential for the total loss of the woodland with its biodiversity, green space (and green networks), and amenity value. Such potential woodland loss, including any loss from development at Darnlee, should also be seen in the context of the lamentable record of local tree removal, viz. that for the Premier Inn etc. development immediately across the road in Tweedbank; the unnecessary felling for the original Tapestry building by the railway station; and the significant felling required for the Tweedbank Expansion at the Lowood (MTWEE002) development, when and if that proceeds. Other local instances of smaller areas of unnecessary mature tree felling, eg. the play park small wood on the north side of Abbotsford Terrace, further contribute to the loss of mature trees.

It should go without saying, that in terms of carbon sequestration, tree removal should be avoided whenever possible. Compensatory planting and biodiversity offset would be required but would likely occur elsewhere. Darnick would in any case lose a valuable natural asset.

### **Recreation and Amenity**

Darnick has three amenity areas. Within the settlement boundary on the central north edge is children's play park on the edge of a small area of woodland. On the south east corner of Darnick, outwith the settlement boundary, there is access to a small football field. Also outwith the boundary, the Community Woodland is the only extensive open amenity area available to residents and visitors. The woodland is highly valued and used daily by walkers, with and without dogs, joggers, wildlife enthusiasts, and those who carry out necessary woodland management. The woodland also includes a developing orchard which supports the aspirations of Council's draft Food Growing Strategy<sup>6</sup> which "*...seeks to assist those looking to find their local food growing site, and to present other opportunities for other sites that could be used for lots of different food growing.*" The loss of even part of this valuable woodland asset would have a considerable effect.

### **Settlement boundary**

The Community Woodland was not included in the PLDP as an allocation but is preferred future expansion, currently outwith the settlement boundary, and provided for in Policy HD4 Further Housing Land Safeguarding. It raises the question as to the purpose and strength of an existing settlement boundary in its capacity to confine settlement development.

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<sup>6</sup> <https://scotborders.citizenspace.com/customer-communities/draft-food-growing-strategy/>

**Development cumulative impact**

Refer to the comments made above for the Darnlee allocation on this aspect. Further cumulative development only serves to compound the issues for design and settlement identity.

**Settlement coalescence and Countryside Around Towns (CAT)**

An anti-coalescence policy from previous LDPs has been incorporated into the general CAT Policy, EP6. Initially these were to maintain the separate identities of Darnick and Newstead from Melrose. Development of even half the Community Woodland area would bring Darnick closer to inclusion in continuous built development with Tweedbank across the A6091 main road. Were the whole of the woodland area developed, either for housing or railway extension, together with plans for Tweedbank Expansion at Lowood, the built environment would extend virtually uninterrupted from the west end of Galashiels to the east edge of Darnick.

The portion of the Community Woodland to the south of Broomieles Road, is listed as key greenspace (GCDARN001) and is the only area in Darnick designated as such by the current PLDP. The main area of the Community Woodland to the north of Broomieles Road, is of equivalent value as greenspace, but is outwith the settlement boundary. This therefore requires rigorous application of the CAT policy to ensure that this area of Community Woodland is protected.

**Conclusion and Recommendation**

The Darnlee allocation together with the Preferred Area for Future Expansion requires serious and rigorous attention to the combination of all the above factors and concerns.

It is my view that neither the Darnlee ADARN005 allocation, nor the proposed expansion into the Community Woodland, were they to be progressed, could be mitigated in any way. As such, I strongly urge that the allocation and reference to future expansion be removed from the Proposed Local Development Plan 2020.

Yours faithfully

Andrew Panter