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**From:** [REDACTED]

**Sent:** Thu, 21 Jan 2021 11:18:22

**To:**

**Cc:**

**Subject:** LDP2 consultation: Netherbarns/Abbotsford AGALA029

**Sensitivity:** Normal

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CAUTION: External Email

TO THE PLANNING DEPARTMENT

I am writing to express concern with, and propose amendment to, SBC LDP2, specifically the proposal for Galashiels site AGALA209 Netherbarns. I also refer to the supplementary map produced by SBC due to many queries received and misunderstandings regarding the Netherbarns proposal, showing its relationship to Abbotsford House.

In summary, this site should not be deemed suitable for housing; if it continues to be designated for housing the site must be amended and the requirements revised.

#### Unsuitability for development

The draft plan site requirements confirm the sensitivity of the River Tweed Special Area of Conservation and the need to protect its integrity; the need to protect the setting of Abbotsford House; the need to amend Core Path (Southern Upland Way). All of which are primary elements of Scottish Borders natural capital and the amenity and tourism offer. Negative impact on any of these should be sufficient to eliminate the proposal but the cumulative impact on all three places the need for elimination beyond doubt. Due to the topography there are no mitigating measures eg even mature woodland >30m high, of greater density than that proposed, will not screen houses from Abbotsford, the river or an amended Southern Upland Way, especially from the South Bank of the River Tweed ie Abbotsford.

There are many other alternatives, even within the Gala envelope.

The site should be removed from the draft Local Plan.

#### Unsuitability of proposal and need to amend site requirements

If the site is deemed essential for reasons that are unclear in LDP2 as drafted and should be made clear, the following amendments are proposed (the supplementary map is considered integral to the proposal):

- The present site proposes 45 houses on 7.3ha, a density of 0.16ha/house. In contrast, Site AGALA017 Coopersknowe Ph4 offers a density of 0.042ha/house ie 75% lower and AGALA024 Easter Langlee Expansion Area offers a density of 0.056ha/house. Clearly the Netherbarns site proposal is driven not by a desire to provide housing but to create a luxury estate. The proposal should be amended to meet housing, not commercial, need.
- The proposal is that housing should be on two levels, the second, south eastern level breaching an existing woodland screen/shelterbelt. The associated 'No Development area' is constrained for no apparent reason except to allow commercial exploitation ie to increase the number of houses and provide a view to Abbotsford House, which view must be reciprocal. If housing provision is the driver, it can be achieved on a single level with greater density. This would allow the 'No Development area' to be increased which, with associated reinforced screening planting (of non-commercial species), would significantly reduce the visibility from Tweed, a re-routed Southern Upland Way and from Abbotsford. (All achieved with limited commercial impact although this is outside the scope of LDP2.)

- Site requirement 'Mitigation required to ensure no significant adverse effects upon integrity of River Tweed Special Area of Conservation' should be amended to read 'Mitigation required to ensure no adverse effects upon integrity of River Tweed Special Area of Conservation. 'Significant' is a subjective ie unquantifiable term.
- Site requirement 'Reinforcement required to the existing planting along the south eastern boundary of the site to further protect the setting of Abbotsford House' should be amended to read 'Preservation required of all existing planting along the south eastern boundary of the site and additional planting to reinforce it, forming an unbroken screen respecting topography; to protect the setting of Abbotsford House (there is no protection as presently proposed).
- Regarding the supplementary map viewing distances, this should be amended to show clearly the visual impact:
  - It should show the visibility distance from the Abbotsford gardens closest point to the development (est <200m); the gardens and view being of as great, possibly greater, significance than the house itself. This will produce a more realistic interpretation, particularly in regard to the proposed lower development area.
  - Inclusion of an elevation to show the required height of trees to screen the development from Abbotsford; as seen from the highest point which is possibly the Hope Scott Wing.

It has been said by others that the proposal as it stands is an act of cultural and historical vandalism and an own goal regarding the Scottish Borders historic, tourism and scenic offers. I would not use those terms but am utterly perplexed as to why there is a need to use this highly sensitive site, in this way, when there are many alternatives?

I would be grateful for acknowledgement of these concerns, please.

