

## Response ID ANON-VDDE-RAF5-H

Submitted to **Proposed Scottish Borders Local Development Plan**

Submitted on 2021-01-25 12:40:23

### About you

Are you responding as an: individual, group / organisation, agent?

Individual

### Individual

What is your name?

**Individual name:**  
Rosalyn Anderson

What is your email address?

**Individual Email:**  
[REDACTED]

What is your address?

**Address line 1:**  
[REDACTED]

**Address line 2 :**  
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**Address line 3:**

**Town / city:**  
[REDACTED]

**Postcode:**  
[REDACTED]

What is your contact telephone number?

**Contact number:**  
[REDACTED]

### Proposed Local Development Plan Menu

Where would you like to go?

Submit your response to the consultation (Exit)

### Quick Comment / Supporting Information

Leave a quick comment about the Proposed Scottish Borders Local Development Plan, or planning and development in general.....

#### Quick Comment:

No space for me to comment on Section 8 properly as I was stopoped after section 7 and directed here!

No facility to add photos regarding Darnick proposals which is disappointing and I expected to be able to have this facility to provide added visual information for readers unfamiliar with the area, especially as the encouragement appeared to be to use this comment option rather than email or written letter .

Section 8.2:all planning applications for housing and business, including agricultural use, must have an essential requirement for green mitigations, including solar panels ( and allowance of maximum permitted numbers, whether a conservation area or not, as we have to take climate change seriously and so need to be much more flexible) . I am aware of some developments using shread eco facilities such as biomass boilers and have no information as to success but shared developments such as this, and consideration for financial help with heat source pumps seems to be the way forward as well as an absolute requirement for a wind turbine for all new developments. This would help with acceptance of the larger scale developments.

Avoidance of monoblock and other surfaces which create slip hazards and increase demands on the gritting services in winter is an important consideration. They also presumably add to the carbon footprint of developments compared with tarmac.

Section 8.3:Improved connectivity through better cycling and suitably surfaced footpaths of adequate width to allow safe passing of walkers and cyclists and social distancing is vital. This should be a key learning point from the pandemic, with pavements on both sides of roads which are also popular walking routes.

Section 8.10 Flood Risk. Although a lot of important work has been done and is on-going on a large scale for towns at risk across the Borders, this rigour does not seem to be applied to smaller new developments and Darnick Vale is a good example. ( again I had a photo to attach which shows the current lake).

My detailed comments follow within the various sections.

If I can attach photos within a word document this will arrive as a separate response

## **Do you wish to submit supporting information?**

### **Submissions:**

No file was uploaded

## **Where would you like to go now?**

Proposed Local Development Plan Menu (includes Exit option)

## **Comment on Introductory Chapters or Appendices**

### **Which Introductory Chapter or Appendix are you commenting on?**

#### **Context or Appendix:**

2. The Changing Context and Meeting the Challenges for the Scottish Borders (P 11-14)

#### **What are your comments regarding this Introductory Chapter or Appendix?:**

2.3/2.4/2.5 The changing demographics of the Borders population needs to be a key consideration when designating areas for potential housing. Many rely on driving cars from rural areas to access necessary services which is not a sustainable safe or climate-friendly option. Ageing leads to increasing health issues which impact on driving safety, including visual impairment due to cataracts.

The housing requirements of this ageing population need a robust assessment through public consultation across Scotland as part of all Local Development Plans but especially for areas like ours. The impact on health and social services is mentioned and this needs to be spelt out clearly to everyone. There are many risks related to a scattered and increasingly ageing rural population which some will appreciate and accept, whilst others would relish access to more centralised affordable housing, close to the services which they will increasingly depend upon.

2.9 The necessity for green space to support health and well-being of all ages, especially in the midst of a global pandemic, is well-recognised and throughout the last year the Borders population has appreciated our good fortune in those respects though sadly some are driving distances to access this. I will refer back to this under the Darnick site section but suggest that in this council in particular, the home of the first UK Community Woodland started by the late, and internationally recognised, Tim Stead of Blainslie, that all Development Plans should designate all Community Woodlands as 'Key Greenspaces'. This is not currently the case in Darnick and all of this of course links into future sections on Climate Change challenges and the challenge of maintaining the biodiversity of The Borders. The goldfinch, siskins, bullfinches, redpoll, fieldfare and so many other birds as well as the roe deer, badgers, foxes and the hidden insects which help to sustain the countryside, are the key inhabitants of this beautiful area. They rely on us to protect it for them. Without them and the greenspaces, we will all suffer, whether physically, mentally or both, and we will add to the burden on the health and social services locally and beyond.

This links into the Tourism discussion later in the LDP as well as the Town Centre development discussion as housing in town centres makes sense but access to greenspace from those centres is essential.

2.13 The housing needs of the disabled population in The Borders is acknowledged as unknown as the working group has not yet reported. As highlighted for the ageing population, this consultation is critical for the LDP. Identifying development land for housing without knowing who will need that housing does not make sense.

Easy access to support services and to accessible public transport are crucial for both the disabled and the ageing population and in practical terms, for all of us!

2.14/2.15 The extension of the railway to Carlisle could potentially help with post-Covid unemployment and with greener tourism. Housing close to transport hubs, whether railway or bus, is sensible. Sympathetic town centre developments of mixed housing could help to sustain communities and encourage movement nearer to support services to reduce future strain on the NHS and social services.

2.16 Mobile network blackholes exist in the Borders especially within houses and with increased home-working through Covid and presumably for a less commuter-dependent society, this needs to be addressed. The focus on 5G to solve this does not seem to be the way forward unless the mobile companies can work together and use all available masts which is currently certainly not the case.

## **What would you like to do now?**

Comment on other Introductory Chapters or Appendices

## **Comment on Introductory Chapters or Appendices - page 2**

### **Which Introductory Chapter or Appendix are you commenting on?**

#### **Context or Appendix:**

3. Policy Background (P 15-18)

#### **What are your comments regarding this Introductory Chapter or Appendix?:**

3.4 I note that the previous SDP was rejected based on land use and transport issues and appreciate this is a vast topic and that Queen's Counsel were involved. However, this is a really important aspect and one which this LDP needs to focus on to avoid further rejection.

In such a vastly disparate area covering such a huge footprint in south-east Scotland, the population need to be a key component in being realistic about the future.

Public transport and connections between communities are crucial but also, can so many communities be sustained in the long-term?

3.8 (links to 4.9 also) The spatial strategy has become even more vital during the Covid pandemic with more people regularly seeking space for safe walking, cycling and other exercise, whilst also maintaining social distancing. This is very difficult on a number of very busy roads which only have paths on one side and also on the existing public and surfaced footpaths which are not wide enough to enable safe distancing.

## **Which Introductory Chapter or Appendix are you commenting on?**

### **Context or Appendix:**

4. Vision, Aims and Spatial Strategy (P 19-22)

### **What are your comments regarding this Introductory Chapter or Appendix?:**

4.2 The need for enough business land is identified but in the light of Covid this needs careful thought. There are empty new offices in Galashiels and surely the pandemic has highlighted that home-working is possible for many people. This links to 5.4 which suggests there is enough business land already .

4.3 This gives the impression that there has been over-identification of new housing land in the LDP given the level of overall uptake. This suggests that inclusion of land within conservation areas which are a good focus for tourism, should be avoided .

4.4 Changing town centres could mean more creative sustainable town-centre-based housing to develop communities close to transport hubs, support services and facilities for leisure/ hobbies/ improving well-being. This links to 7.3 onwards and the vacant shops/reduced footfall in many areas across the Region.

4.7 There is clear need to reduce travel and especially reliance on transport linked to fossil fuel but also because our Borders roads see far too many road accidents. This links with 2.14/2.15 and building close to transport hubs and to 4.4 and changing town centres.

## **Which Introductory Chapters or Appendix are you commenting on?**

### **Context or Appendix:**

5. Growing our Economy (P 23-26)

### **What are your comments regarding this Introductory Chapter or Appendix?:**

5.3 Covid is expected to have impacted on unemployment figures so that the 2018 data may not be useful for the 2020 LDP when we continue to be in the midst of a pandemic.

Predictions are a challenge and whilst some new retail businesses had opened in the interim period before our current lockdown their survival may well be in doubt.

The self-employed in the Borders will be suffering to differing degrees and the full impact of Covid on employment figures remains an unknown.

Linking forward to 7.3 the impact of Covid on vacancies and footfall on the different Border towns will surely alter the graphs considerably with reduced tourism including no Kelso races, no events at Springwood , no fishing tourism etc and the prospects for many people's employment looks grim so anything which can enable regeneration in a post-Covid world is important. Fishing certainly can allow for social distancing but many of our large tourism 'draws' as well as our local traditions which do bring folk into town centres for the Common Ridings all pose huge social distancing challenges.

## **Which Introductory Chapter or Appendix are you commenting on?**

### **Context or Appendix:**

6. Planning for Housing (P 27-28)

### **What are your comments regarding this Introductory Chapter or Appendix?:**

6.1 The LDP must include identification of adequate development land but 4.3 seems to suggest there is more than enough for the next 5 years although the suitability of the locations is unknown, taking in to account figures in 2.4 for the changing demographics. The housing needs of the ageing population, as well as the disabled, are not adequately identified, as already highlighted and Covid adds to uncertainty regarding housing demand created by internal movement or people moving to the area for work.

6.2 The figure 7228 is given in this section as the Housing Land Requirement to 2030/31 but the unit of measurement is not defined. Is this the total NUMBER of houses and how does this relate to developments which are flats? In light of the changing demographics, more single storey and single or double occupancy housing would appear necessary as well as retirement complexes though public consultation seems critical to establish the aspirations of our population as we age and become more dependent.

## **Which Introductory Chapter or Appendix are you commenting on?**

### **Context or Appendix:**

7. Supporting our Town Centres (P 29-32)

### **What are your comments regarding this Introductory Chapter or Appendix?:**

7.3 As mentioned earlier the Kelso data looks impressive up to 2019 and presumably relates very much to tourism due to the races, fishing and Springwood Park all of which will sadly have been impacted by Covid and which also do carry a fairly heavy carbon footprint.

The drive to develop tourism across the Borders therefore, in normal times, would seem to be one of the keys to increasing footfall on the high streets of our towns , if we can address public transport links.

As we move forward the marketing of the Great Tapestry of Scotland in Galashiels will be critical. Too many people who have never seen it have a negative view of an incredible work of art created by the Scottish people. It captures every aspect of our wonderful history from neolithic times, via Elvis at Prestwick, the design of the Mini , our wonderful musical and crafting traditions, our beautiful landscapes, the Scottish Parliament and so much more. We need local people to support endeavours such as this to bring in not just 'standard' tourists but school, college and university students, potentially from across the world to learn from our historical links to the textile industry and our very highly regarded textile degree courses in Galashiels.

## **Comment on Sites in Settlements A to E**

### **Which Site are you commenting on?**

#### **Site A to E:**

Darnick: ADARN005: Land south of Darnlee: Housing

**What are your comments regarding this Site?:**

This land borders Broomilees and Abbotsford Road , the main route through the village. This route is used by many NHS staff to access the hospital. Visibility on Abbotsford Road from the south aspect is affected by a sharp bend and narrowing of the road as well as parked cars, some of which are connected to the hospital parking pressures.

Broomilees Road already has traffic pressures from existing houses and the more recent development off this road , Gilroy Gardens. There is no footpath on Broomilees Road.

It is the only access route for local farms located further west along that road which means that tractors and other farm vehicles as well as delivery vehicles use it regularly.

It is used by many for walking and cycling to access local green spaces and to travel further to Cauldshiels Loch and beyond.

The houses on this road do not have their own parking space and so they park of necessity outside their houses.

The suggestion that 'displacement parking' within the new site could address this problem is very insensitive to the needs of the residents of Broomilees Road, and assumes that all could manage to walk, whatever the weather to access their vehicles at a greater distance.

The suggestion of 2 access roads for the designated site needs careful consideration. Humans take the easiest option and the new development could become a run-through from Broomilees Road although that could perhaps offer safer access for everyone onto Abbotsford Road but surely risks more loss of wildlife habitat. The unadopted road, Lye Road, just west of the currently designated Key Greenspace in Darnick ( see my later comments about omissions of other KEY GREENSPACES) , has become a

' rabbit run' for vistors who arrive with vehicles at the woodland. They park facing west and then take the easy route east by using that inappropriate route with its deteriorating surface, instead of turning round to head back down Broomilees Road. I include this as a reminder of the existing traffic pressures and an example of human behaviour.

The boundaries of the Darnlee designated area contain significant trees which are host to an abundance of wild-life and notably a huge flock of fieldfares were resident for some weeks on the large holly tree in the autumn and goldfinches are also regular visitors and much more besides which your anticipated survey will show.

Preserving the character of Darnlee, with its huge significance to the history of the village, the creation of the Smith Memorial Hall and the building of Abbotsford, will be a challenge if 10 houses are to be fitted into the designated space.

I struggle with the phrasing about 'a high standard of design' being required in light of the location within the specified National Scenic Area and Darnick Conservation Area, from a council which allowed the enormous blot on the landscape on the side of The Eildon Hills, visible from miles around.

Please do get SEPA involved and pay heed to their advice and look at other areas in the village for which you granted planning permission. Much work was done to identify the flood-risk issues at Darnick Vale but planning permission was granted, albeit, thankfully, for reduced density. A huge amount of earth moving ensued by the builders (with significant disruption and danger with muddy roads), to create banking and raised foundations, which presumably will sink over time and the remaining plot(s) is currently a significant lake ( I have photos which I had hoped to attach but so far have not managed to access that facility). More houses, as I understand it, add to water collection problems with run off from rooves etc.

In summary, I am struggling to find any reason why this land would be deemed appropriate for housing development in a village with very minimal public transport and in this position next to a narrowing part of an already overly busy road through the Conservation Area, especially as it appears that the Borders has ample designated areas and has specified the need to look at town centre development and areas close to transport hubs.

I have noted that Darnick is under the spotlight for more housing due to its 'near proximity' to the railway but if commuting by train is ever an option or even needed in the future or travel to Edinburgh for entertainment, my suspicion, based on observation of others, and knowing my own practice in the past, is that cars are used to get to the railway station for rapid return home after your journey, especially in the colder months, unless you actually live within minutes of the terminus.

Darnick to Tweedbank station takes around 15 minutes on foot at a non-heart-stopping pace. So in the spirit of reducing our dependence on cars, housing needs to be closer to transport hubs and surely there is plenty of scope in the Lowood space already purchased at Tweedbank which is very close to the railway and the much more frequent bus services BUT see later- this will require expansion of school and medical services.

**What would you like to do now?**

Comment on other Sites in A to E settlements

**Comment on Sites in Settlements A to E - page 2****Which Site are you commenting on?****Site A to E:**

Darnick: GSDARN001: Darnick Community Woodland: Greenspace

**What are your comments regarding this Site?:**

This designated area, known locally as Wee Shunters' Wood, is a haven for wildlife and is much treasured by the local community and many others who utilise it for walks and picnics.

However, my major comment regards the significant omission of the largest Greenspace in Darnick , the Community Woodland which lies opposite GSDARN001, on the other side of Broomilees Road.

It is a travesty that the whole Community Woodland is not designated as a KEY GREENSPACE by a council which was home to the first UK Community Woodland, developed at Wooplaw, thanks to the foresight of [REDACTED] celebrated wood craftsman of Blainslie who is recognised for his talents across the world. To allow loss of such a greenspace by failing to designate it appropriately to preserve it for future generations would be a tragedy on so many levels.

I understand it is owned by SBC.

Why has this not been marked on the Proposed Plan of Darnick within this LDP in the same way as GSDARN001 and why does the LDP state that 'there is potential in the longer term to expand the village to the west of Darnlee' which must mean this undesignated greenspace!

This larger greenspace, comprises an established woodland area, known as Shunters' Wood, bursting with a wide variety of wildlife over 24 hours and captured on web cameras, in case of any doubt. ( recently roe deer, badgers, foxes, owls and more)

This is a designated Community Woodland and forms part of the Border Forest Trust and, very importantly, of the Millennium Forest of Scotland. (again photos were available to submit but this Citizen Space does not appear to allow that). It connects to a burgeoning extension of this Community Woodland, closer to Darnlee, which is home to numerous younger trees planted by villagers as part of a wonderful community project. Both areas offer distinct and different benefits to

those who visit, which includes walkers, both local and from further afield. Residents of Tweedbank and Melrose utilise these areas regularly . The established wood , like GSDARN001, is a well developed woodland with bushes and tree canopies which encourage specific wildlife whilst the newer area near Darnlee is a more open space with views for walkers to The Eildons and surrounding rolling countryside. The proximity of The Waverley Castle Hotel to this site makes it a wonderful accessible area for hotel residents and it is hoped the hotel will re-open at some stage.

In addition to recreational use, the woodland has been used for many educational purposes with local schools and students as well as for well-being projects and for community service projects for young offenders.

This is very precious space on so many levels and deserves protection by official designation as a KEY GREENSPACE. and not as a potential housing development.

I sincerely hope that this is an accidental omission from the designated greenspace on the Darnick plan and not an intended omission which allows for its destruction in the future.

**Which Site are you commenting on?**

**Site A to E:**

**What are your comments regarding this Site?:**

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**What would you like to do now?**

Proposed Local Development Plan Menu (includes Exit option)

**Comment on Sites in Settlements F to H**

**Which Site are you commenting on?**

**Settlements F to H:**

Galashiels: AGALA017: Coopersknowe Phase 4: Housing

**What are your comments regarding this site?:**

Further development in this area and on Winston Road will add pressure to an already busy road which leads past the large primary school in Langlee.

The addition of a roundabout at the junction of Langshaw and Melrose Roads, as opposed to traffic lights feels more risky but something is already needed at that junction before any further development.

**What would you like to do now?**

Comment on other Sites in F to H settlements

**Comment on Sites in Settlements F to H - page 2**

**Which Site are you commenting on?**

**Settlements F to H:**

Galashiels: AGALA029: Netherbarns: Housing

**What are your comments regarding this site?:**

There is already too much traffic trying to exit from the existing development onto the road into Galashiels at peak times. It would seem madness to add to this congestion and the frustration of residents trying to join main road traffic with potential for accidents and any access onto the A7 will be fraught with problems and road safety issues

Mitigation of the impact of this development on the views from historic Abbotsford, a great tourist attraction in normal times, would seem impossible without excluding light from the new properties and we all need more natural light in our lives, not less, especially with out climate change pressures. This needs to be considered for all proposed developments across the Borders - don't build houses in places which then require tall trees/ boundaries to disguise them, blocking out natural light and necessitating use of more electricity .

My serious worry is that this will become another blot on the Borders landscape with an impact on the A7 and traffic congestion and accidents.

The beauty and attraction of the Borders must be retained and is mentioned as a core part of the LDP aims and objectives and yet many parts of the LDP appear to oppose that ambition.

**Which Site are you commenting on?**

**Settlements F to H:**

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Proposed Local Development Plan Menu (includes Exit option)