

Response ID ANON-VDDE-RPPU-A

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

Submitted on 2021-01-22 14:52:35

About you

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

Individual

Individual

What is your name?

Individual name:

Tom Miers

What is your email address?

Individual Email:

[REDACTED]

What is your address?

Address line 1:

[REDACTED]

Address line 2 :

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)

Comment on Policies

Which Policy are you commenting on?

Policy:

Policy HD2 Housing in the Countryside

What are your comments regarding this Policy?:

Housing in the countryside policy sometimes works well, but its basic flaw is that it seeks to achieve its objective (preventing haphazard development in open areas) by setting geographic limits or else restrictions based on whether or not there was a building in situ previously. The alternative is a rather loose economic justification for new building which is often used to get round these other stipulations.

The problem with this approach is it does not allow for attractive new buildings to be built in the Borders except within or on the edge of settlements. In other words, we are in the absurd situation where many of the most attractive buildings in the Borders – from cottages to castles – would not be allowed under current planning rules. This restricts innovation, investment and the potential for aesthetic improvement of our environment, and encourages low quality buildings that fit geographic or economic criteria instead. The council should work more imaginatively to allow new buildings in the countryside that are judged on the quality of their design and setting. More generally, if developments are higher quality, they meet less public resistance, allowing more (and therefore less expensive) development overall.

What would you like to do now?

Comment on Policies - page 2

Which Policy are you commenting on?

Policy:

Policy ED8 Caravan and Camping Sites

What are your comments regarding this Policy?:

The definition of a caravan depends on out-of-date national legislation that allows, in effect, cheap housing to be built to lower standards than would be required of ordinary housing if it fits theoretical criteria of portability that are in practice never used (static caravans are almost never moved and so perform the same function as holiday cottages). SBC can't change that definition, but it can apply the same general standards of development to caravan sites as it does to other types of non-housing development, and thereby arrive at the same result as for housing. Planners seem pre-disposed to caravan sites because they appear to offer economic advantages. But if a developer came forward with plans for holiday cottages that looked the same as static caravans they would be refused out of hand. The Council should work on applying the same standards in both cases as far as the legislation allows.

Which Policy are you commenting on?

Policy:

Policy EP6 Countryside Around Towns

What are your comments regarding this Policy?:

I object to the removal from the Countryside Around Towns (EP6) of the Netherbarns site. The policy in both previous and proposed form, states "The aim of this policy is to ensure that the identified Countryside Around Towns (CAT) area and the high quality living environment it provides is protected and enhanced. The policy aims to prevent piecemeal development that detracts from the area's outstanding biodiversity, landscape, historical and recreational context." If that was correct in respect of the Netherbarns site in the last LDP, why does it not apply now? As well as Netherbarns being removed from the LDP, EP6 should be restored to its previous extent.

Which Policy are you commenting on?

Policy:

What are your comments regarding this Policy?:

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Policy:

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Policy:

What are your comments regarding this Policy?:

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: AGALA029: Netherbarns: Housing

What are your comments regarding this site?:

The process whereby SBC inserted this site into the draft LDP is open to question and is subject to a formal complaint by me as well as (I understand) an FOI request and a Standards investigation by members of the public. These are all presumably being considered by SBC separately.

Further to my complaint on process I object to the inclusion of Netherbarns in the Galashiels settlement boundary for the following reasons:

1. Allocating Netherbarns for housing goes against explicit national planning policy (for example NPF3 and its references to protecting our cultural heritage) and also council policy set out elsewhere in council documents. Many individual policies on protecting the heritage and economic potential of the Borders contradict the idea of development at Netherbarns, not least the 'Countryside around towns' policy EP6 (which of course is now proposed for amendment to fit). More generally the proposed Local Development Plan includes among its core aims to "protect strategically important business opportunities" and to "preserve and enhance the natural and built environment". Of course, it also aims to "provide a generous supply of ... land for housing" but that should be done if possible without conflict with the previous two. There is no pressing need for housing here since demand for housing land across the Borders is low (something acknowledged by SBC) and so no need for any such conflict. Therefore the economic, cultural and environmental risks highlighted by so many individuals and institutions have no justification (apart from assuaging the lobbying of the developer). There is simply no reason to contradict other policies.

2. While the developer has made changes to the plans for housing on the site, the fundamentals are the same as previous submissions. Essentially a large-scale suburban-style housing estate on this site is inappropriate because it impinges on the landscape setting of Abbotsford House. The landscape setting is part of Walter Scott's vision for this property and so is an integral part of the cultural legacy of the site. Suburban style housing estates are completely out of context here. The council has not addressed this fundamental problem.
3. Nor has the council considered reasonable alternatives to a large-scale development here. For example the site could be suitable for a handful of houses set organically in grounds as commonly found on the edges of towns (not least just to the south of the site). This could 'book-end' Galashiels development in this direction, provide a natural 'blended' border between town and country while preserving the rural landscape setting of Abbotsford.
4. The council has not explained why the whole site has been included within the settlement boundary. Both council and developer state that the intention is only to build houses on the North and West of the site. In that case, why has the rest of the site been included within the settlement boundary and excluded from the countryside around towns policy?
5. The council has not taken into account submissions from respondents to the MIR on this site, including statutory bodies such as HES (which indicates a clear preference for the site not to be treated as a preferred site and gives detailed recommendations as to how it should be treated if brought forward) and SNH.
6. The council has not provided a proper or objective assessment of the economic Impact of damaging the potential of Abbotsford House. It simply states that there is no evidence that building has an impact on tourism, which is obviously questionable. If such developments have no impact, why is housing not allowed in and around other historic and cultural sites? The economic impact of changes to the built and natural environment is difficult to measure, but there are established methods used by economists to assess this. SBC has made no serious effort to attempt such assessment itself or commission it from outside, despite the obvious economic value of Abbotsford and the risks of damaging the integrity of its setting.
7. The council bases its dismissal of the visual impact from Abbotsford House on the fact that the House is shut in Winter and that therefore the development would not be visible when visitors are at the house. This of course admits that the development is unsuitable (why otherwise does it matter if it visible or not from certain angles?) and also ignores the fact that a) the House is open in Winter and b) others, not just visitors to the House, can view the landscape from that angle.

What would you like to do now?

Proposed Local Development Plan Menu (includes Exit option)