

**From:** [REDACTED]  
**Sent:** 01 February 2019 11:37  
**To:** localplan <localplan@scotborders.gov.uk>  
**Subject:** Submissions for Main Issues Report - Response to Consultation

Dear [REDACTED],

**Please find below my consultation comments and responses which I wish to submit regarding the Main Issues Report for the Local Plan.**

**Thank you again for allowing me some extra hours to complete my responses. I look forward to receiving confirmation from you that these have been received and will be included for consideration.**

Regards,

[REDACTED]  
[REDACTED]  
[REDACTED].

## PLANNING FOR HOUSING

### Q.7 Additional Housing

Do you agree with the preferred options for additional housing sites? Do you agree with the alternative options? Do you have other alternative options?

#### Darnick, by Darnlee ADARN005

I am opposed to ten units here, in this highly visible location at the edge of the settlement as it is too great a number to fit in to the parkland setting. Perhaps half that number of different, individually designed houses each with well screened garden ground would fit more appropriately and acceptably here. Tree planting should be a requirement. If the ground is privately owned, not by a developer, perhaps the plots could be sold off individually, to prevent the character of the development from looking like an estate plonked on the landscape. Was this not part of a historic battlefield site?

#### Netherbarns AGALA029

I am opposed to this proposal for 45 units here. The site has been rejected at public enquiries several times already, for reasons that are well documented and these have not changed. Naturally the owner/builder/developer wants a return on their investment, and it is a strange irony that the name Ballantyne should still be causing grief to the heritage that Sir Walter Scott has left to us, and which enriches our lives and which through tourism and visitors to Abbotsford, brings a much needed boost to the economy of the whole region. It would be a most regrettable mistake to risk in any way, the integrity of the setting of Scott's wonderful estate and legacy. How would a modern housing estate look plonked in front of any of the other big historic Borders houses, visible from the road? Planning permission for that would not be acceptable - neither should it be for Abbotsford.

Galashiels has many spaces closer to the centre of town that could provide land for development - in particular for affordable housing units which are in such high demand (vis the number of applications for the proposed new development in Newtown St Boswells, as revealed by Eildon Housing Association, which outnumbered several times over the number of units planned). Incentives from the Council to owners of these brownfield town centre sites could result in enabling housing development within walking distances of services and facilities without compromising sensitive landscapes. The council should be in no rush to allow development of this ultra sensitive site at Netherbarns, for the economic gain of a developer, when to do so puts key assets in jeopardy and does not meet the needs of sectors of the housing market that are currently not well catered for.

Sufficient overdevelopment so close to the river Tweed and far from the town centre has already been permitted - wrongly, in my opinion. Furthermore, this site, located adjacent to busy junctions and carriageways is not likely to promote cycling and walking into town which is a requirement for new sites. On the contrary, development at this location is only going to

increase the number of car journeys made by residents and service vehicles, and add to traffic congestion and pressures on parking availability in town.

Most of the building (apart from the estates around the Kingsknowes Hotel) on this side of the Tweed consists of large individual houses surrounded by lots of land. It would be marginally more acceptable to allow for a similar scale of development on this site, rather than a suburban style of development which, when looking towards the direction of Selkirk, is not in character with its surroundings.

If push comes to shove over this site, a limited number of plots could be sold off with strict conditions attached to encourage the creation of small holdings - stables, orchards, woodlands and other features - which would preserve and if done correctly, enhance the rural character of the setting.

Siting and setting of developments are valid planning matters and must be respected.

### **Harmony Hall Gardens, Melrose AMELR013**

This open space, once an orchard I believe, and still containing fruit trees, is not an appropriate location for housing development. It is too close to historic buildings, to St Mary's School exit, to the Melrose Sevens rugby pitch and other recreational sports fields. It is also used during the book festival which is a major boost to the local economy. Five single storey houses here (for they could not be higher without compromising the surrounding historic buildings) are too many for a site this size and this number or fewer would not be worth the loss of what is currently a valued community resource and an attractive open space within the town.

An alternative option would be to utilise unbuilt allocations on the former Dingleton hospital site or potential 'brownfield' sites in Melrose, namely West Grove and Priorwood House, currently owned by a local developer, and which are already situated in residential areas.

(Also see reference to alternative options for additional housing in Q.9)

## **Q.8 Housing In The Countryside**

Do you agree with the preferred option for addressing proposals for housing in the countryside? Do you agree with the alternative proposal? Have you any other options which you feel would be appropriate?

I believe there could be more flexibility regarding these policies. The Preferred Option offers understandable control over development but does not seem to ensure appropriate design or screening. I believe that stand-alone, individual builds could also be supported, particularly eco friendly and zero carbon builds. However, a strict set of conditions and high standards relating to setting, design and materials would have to be clearly in place, and ideally should apply to both the preferred and alternative options.

## **Question 9: De-allocation**

Do you agree with the proposed existing housing allocations to be removed from the LDP? Are there any other sites you suggest should be de-allocated?

My comments here relate to a site from a previous Local Plan, which is as yet undeveloped, and which regretfully has not been de-allocated. It has a long and varied history, sitting as it does above the Malthouse Burn on the lower slopes of the Eildon Hills and development proposals there have always been the subject of a high number of valid objections.

Indeed, when it was Ref.02/01258/FUL, the SBC site assessment in 2004 stated '...this site is totally unsuitable for development purposes...it lies on the lower slopes of the Eildon Hills, with paths to these hills crossing the site...It is an existing wildlife habitat, important to be retained for public benefit...the riparian and woodland areas are diverse and valuable and there is an active rookery in a grove of mature larch trees...' There were several comments too about the poor management of the site by the owner.

Until that time, previous councils had refused development proposals for this site, because of its sensitive nature. However, in spite of all that, the council at that time were under great pressure to approve sites in the so called 'core area' for inclusion in the LP because of the proposed railway reinstatement, and some 13 years ago it became an approved site.

The developer objected in writing to the approved capacity of 25 units rather than 50, stating that he considered it was **'not viable to develop this site in an acceptable manner at that capacity.'**

For this reason the site has remained and still is undeveloped, but just a few months ago became the subject of an active planning application for 26 units, possibly in order to avoid de-allocation (Ref 18/01385/FUL)

Given the developer's opinion that development of this site is inefficient for that number of units, it must be his intention to develop other land he owns on the eastern boundary of the site, further up the Eildon Hills, and to the south, also on the

Eildon's landscape setting. This would result in development creep further up the Eildons' landscape setting and would also be totally unacceptable.

Constraints on the sloping Croft site cited by council officers are numerous and include flood risks, challenging topography levels, civil engineering requirements to create a new access road to the site, increased traffic from massive development at the former Dingleton Hospital site, and parking congestion on Dingleton Road, as well as threats to ecology - particularly the Malthouse Burn - which must be protected.

Add to this the fact that the site lies squarely on the landscape setting of the iconic Eildon Hills - the beating heart of one of Scotland's smallest National Scenic Areas - and it is understandable why this current planning application has drawn in over 120 valid objections, from near and far. Not surprising that people are shocked that development of this site is even being considered. With 300 walkers a week along its paths on the Eildons, as well as these hills being one of the Scottish Geodiversity Forum's 51 best places to explore Scotland's geology, it would seem that this site is unlikely to be able to deliver 26 units in any acceptable way.

Were it now, in 2019, when the MIR states that 'given the limited take-up of allocated housing sites and the limited number of new houses required, it is not anticipated that the LDP will require significant new housing sites', the Croft site would be unlikely to be approved for housing development.

The Croft is a natural green space, an area of undeveloped land with residual natural habitats, colonised by vegetation and wildlife including woodland and wetland areas - all features that the Scottish Government seeks to encourage and sustain, in and around settlements.



The Croft allocation of 25 houses represents just 0.5% of 'effective' housing land supply. The site could be deallocated without compromising the development needs of the Borders.

The MIR states that 'A site is only considered to be effective where it can be demonstrated that within 5 years it will be free of constraints and can be developed for housing. In the case of the Croft, this is proving to be very difficult indeed, and way over 5 years have passed

I propose that it be **de-allocated**.

I also propose an **alternative option** for this additional housing. It happens to be owned by the same developer, but was rejected at the time of the Local Plan approval for the Croft.

The site is larger than the Croft site but near to it. Development on a small part of it would easily accommodate 25 houses without damaging any landscape settings. The site is a contained site bounded on two sides by existing housing developments and would therefore be a natural continuation of these existing developments - adjacent to and below it - that of Eildon View and Fairways. On the third side It has trees and Chiefswood Road and on the fourth side there is a boundary of hedging dto another open field above. this site would have none of the constraints of the Croft site, and its development would not adversely affect Dingleton Road and those already living on it, particularly throughout the period of building. Importantly, it would not be a development that damages the landscape setting of the Eildon Hills, yet would ensure the council's adequate and effective housing land supply.

## Q.14 National Park

Do you support the designation of a National Park within the Scottish Borders? If so, which general area do you think a National Park should cover?

I strongly support the proposal for a designated National Park within the Scottish Borders, and hope that the proposal will be given the go-ahead. The designation would be a magnet for attracting visitors to its unique attractions, landscapes and outdoor activities and would be an additional boost to the tourist economy without putting pressure on infrastructure, health and education services, the way housing developments do.

Because of the rail link to Edinburgh, visitors to the capital city could easily spend a day in the Borders National Park, and be inclined to do so because of that designation. The Eildon Hills - the Borders volcanic past - feature in the Scottish Geodiversity Forum's 51 best places to see Scotland's Geology. The Eildon Hills also feature in Walkopedia's 100 best walks, hikes and treks in the UK, with a very high rating, particularly as they are a moderate walk and can easily be completed within a few hours - perfect for the day visitor market. As already stated, an average of 300 walkers a week use the paths on the Eildons, and the St Cuthberts Way crosses over them too.

A National Park designation would also provide another layer of protection for our special landscapes, particularly those that lie within and adjacent to the Eildon and Leaderfoot National Scenic Area, which are threatened by damaging over-development.

I support the area proposed by the Campaign for SBNP but think it should be extended west from the Eildon and Leaderfoot NSA to include Scott's Designated Landscape and the Tweed as far as Traquair; then south to take in the Ettrick and Yarrow valleys and so include the Tweed's tributaries of Yarrow, Ettrick, Ale, Borthwick and Teviot.

It would be too much to hope, I suppose, for it to extend east into Berwickshire? But it is a pity that it could not also include some of the coast, in particular Eyemouth, Coldingham, St Abbs, and the remarkable and unique Siccar Point, where Hutton's unconformity earned it the title of 'the birthplace of modern geology'.

<https://www.youtube.com/watch?v=JCEDCcHcpYE>

Thank you for the opportunity to comment on and respond to the Main Issues Report.

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