

## Response ID ANON-7TG7-FA4S-Q

Submitted to LDP2 - Main Issues Report

Submitted on 2019-01-31 10:25:54

### Data protection

#### About you

Are you responding as an: individual, organisation, or an agent acting on behalf of a client?

[REDACTED]

#### Organisation

If you are responding as a representative of a group or organisation, please provide details below:

Organisation:

[REDACTED]

Name:

[REDACTED]

Job title:

[REDACTED]

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

[REDACTED]

Town/city:

[REDACTED]

Postcode:

[REDACTED]

Contact number:

[REDACTED]

Email address:

[REDACTED]

### Vision aims and spatial strategy

#### Question 1

##### Q1 Agree aims LDP2:

We welcome that you have identified protection and enhancement of the built heritage as a main aim of the emerging Local Development Plan 2. As the plan progresses, we encourage you to consider how the historic environment (designated and non-designated) can contribute positively to other aims such as good placemaking, regeneration, and attractive and sustainable communities.

### Growing our economy

#### Question 2

Q2:

##### Q2 upload:

No file was uploaded

#### Question 3

Settlement business allocated:

**Upload Q3:**

No file was uploaded

**Question 4****Business Use Towns:****Upload Q4:**

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**Question 5****Land delivery effectively:****Question 6****Agree?:**

We have considered the preferred and alternative options for additional business and industrial / mixed use land sites in the context of our statutory interests (scheduled monuments and their setting; listed buildings and their setting; gardens and designed landscapes and battlefields appearing in their respective Inventories; and Conservation Areas).

In some cases, the preferred or alternative sites have the potential for direct and/ or indirect impacts on heritage assets. However, we consider that in the majority of these cases, robust application of national and local policies and / or mitigation measures identified through the SEA process should be able to mitigate adverse impacts to an acceptable level for our interests.

For those sites where we consider that there may be more significant impacts, more complex issues are raised, or we have comments on the environmental assessment findings for the site, we have provided detailed comments below:

**MESH1001/ MESH1002 Land at Eshiels I/II**

These allocations have the potential for direct and setting impacts on scheduled monument SM3667 Eshiels Roman Camps. We are content with the principle of development in this area and welcome the inclusion of mitigation requirements for an adequate buffer zone to protect the physical remains and setting of Eshiels Roman camps, a suitable management regime for the section of the monument within or adjacent to the development area, and for any infrastructure upgrades to avoid impacts on the scheduled monument. We note that a masterplan would be required for these sites, and recommend early consultation with HES on the development of any masterplan that may emerge.

SEA: you have concluded that development of this site could have a minor negative effect on cultural heritage. We consider that, without robust mitigation, development of the site has potential for significant negative effects on the historic environment.

**SCARD002 Land at Nether Horsburgh**

This allocation has the potential for setting impacts on scheduled monument SM3118 Nether Horsburgh Castle. We consider that there is potential for development of this site, and welcome that the SEA sets out adherence to LDP policy EP8 as a mitigation measure, and that this has been brought forward to the site requirements, but recommend that specific reference to the scheduled monument is included here. We note that there may be consideration of re-routing the A72 through the site, and would expect any such proposal to be considered in terms of Policy EP8 and national policy on scheduled monuments. We note that a masterplan would be required for these sites, and recommend early consultation with HES on the development of any masterplan that may emerge.

SEA: you have concluded that development of this site could have a minor negative effect on cultural heritage. We consider that, without robust mitigation, development of the site has potential for significant negative effects on the historic environment, in relation to the setting of Nether Horsburgh Castle.

**SPEEB008 Land West of Edderston Ridge**

We note that the site requirements for development of this site include a new river crossing. Development of proposals for a new crossing should avoid negative effects on the setting of A listed Neidpath Castle (LB13857). Early consultation with Historic Environment Scotland is advised if impacts on the setting of Neidpath Castle are likely.

**Upload Q6:**

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**Planning for housing****Question 7****Housing agree?:**

We have considered the preferred and alternative options for additional housing sites in the context of our statutory interests (scheduled monuments and their setting; listed buildings and their setting; gardens and designed landscapes and battlefields appearing in their respective Inventories; and Conservation Areas).

In some cases, the preferred or alternative sites have the potential for direct and/ or indirect impacts on heritage assets. However, we consider that in the majority of these cases, robust application of national and local policies and / or mitigation measures identified through the SEA process should be able to mitigate adverse impacts to an acceptable level for our interests.

For those sites where we consider that there may be more significant impacts, more complex issues are raised, or we have comments on the environmental assessment findings for the site, we have provided detailed comments below:

**AGALA029 Netherbarns**

Development of this site has potential for negative effects on the setting of A listed Abbotsford House (LB15104) and the Abbotsford House designed landscape (GDL00001). Whilst we consider it possible to mitigate effects to an acceptable level for our statutory interests, we welcome that this is an alternative, rather than preferred, option. In the event that this option is brought forward to the Proposed Plan, we accept the principle of development for up to 45 units, subject to the

robust application of the site requirements and development of a site masterplan. We would expect the masterplanning process to consider how various factors including building scale, location within the landscape, layout, materials, character, number and type of housing units can mitigate potential effects, and to provide a framework for detailed proposals which comply with local and national historic environment policy. Our views on a masterplan, and any application for this site, will be dependent on the level to which potential effects have been mitigated. We would expect HES to have early involvement and consultation in the masterplanning process.

SEA: Your assessment indicates that development of this site has potential for minor negative effects on cultural heritage. We consider that, without robust mitigation, development of the site has potential for significant negative effects on the historic environment.

#### AMELR013 Harmony Hall Gardens

Development of this site, which is partially within partially within SM90124 Melrose Abbey, has the potential for significant negative effects on the historic environment. In view of this, we welcome that this is an alternative, rather than a preferred, option. However, we consider that the proposed site requirements should be sufficient to mitigate the potential negative effects on the scheduled monument, and its setting, to an acceptable level for our statutory interests. In the event that this option is carried forward to the Proposed Plan, we would expect early engagement with Historic Environment Scotland on any detailed proposals for this site.

#### ASELK040 Philiphaugh Mill

This site is fully within Inventory Battlefield BTL14- Battle of Philiphaugh. We are content with the principle of development here, subject to robust application of local and national policy.

SEA: The assessment finds that the site is partially within the Battle of Philiphaugh Inventory Battlefield, and suggests as mitigation that development must not have a negative impact on the setting of the historic battlefield. For information, site ASELK040 is located entirely within the boundary of the Inventory battlefield. In view of this, we recommend that the mitigation is amended to reflect the direct effects that development will have on this heritage asset, for example  
â development must not have a negative impact on the key landscape characteristics and special qualities of the battlefield.

#### SEDDL001 North of Bellfield II

We are content with the principle of development on this site for our statutory interests.

SEA: You have scored the potential impact of development of this site on Cultural Heritage as neutral. However, you have also identified mitigation measures relating to an Inventory designed landscapes. Additionally, the site requirements include archaeology evaluation / mitigation. This would suggest that some adverse effects are anticipated without mitigation measures in place, and consequently you may wish to consider revising the score for cultural heritage to reflect this.

#### Upload Q7:

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#### Question 8

##### Housing countryside:

#### Upload Q8:

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#### Question 9

##### Agree removed housing :

### Supporting our town centres

#### Question 10

##### Core Activity Areas:

#### Question 11

##### Berwickshire supermarket:

#### Upload Q11:

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#### Question 12

##### Develp contrib town:

### Delivering sustainability and climate change agenda

#### Question 13

##### Support alternative option:

#### Question 14

##### National park:

**Upload Q14:**

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**Regeneration****Question 15****Agree redevelopment:**

Redevelopment of the following sites has potential for positive or negative effects on our statutory interests, dependant on detailed proposals in each case: REYEM007; RJEDB005; RJEDB005; RHAWI017; RHAWI018. In general, we are supportive of regeneration proposals which seek to protect and enhance the special characteristics of historic environment assets, and to secure a sustainable use for them, and would be content with the allocation of the preferred sites on this basis.

SEA: It is unclear why you have not undertaken a site specific assessment of the preferred redevelopment sites. This would have been helpful in determining preferred sites and identifying alternatives, and would also have enabled consultees to provide a more informed response, having had the opportunity to consider the potential site specific environmental effects and potential mitigation or enhancement measures.

**Upload Q15:**

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**Settlement Map****Question 16**

Oxnam settlement:

**Question 17**

Core frontage Newcastleton:

**Planning policy issues****Question 18**

Agree amendments appendix3:

**Any other comments****Question 19**

Other main issues:

**Landowner details**

**Have you submitted any site suggestions in this consultation?**

No

**If yes, please confirm the site and provide the landowner details (if known) for each site you have suggested.:**