From: Sent: To: Subject: Attachments:

15 January 2021 10:15 localplan Objection to AGALA029 site in LDP2 Abbotsford Trust Objection to LDP2 Jan 2021 submitted.pdf

#### **CAUTION:** External Email

**Dear SBC Planning** 

Please find attached an objection to the proposed Netherbarns development **AGALA029** in the LDP2.

I wish to submit this to be included in the Council's consultation.

Thank you for your assistance, and I would be grateful if you could acknowledge receipt.

Yours sincerely,

#### Giles Ingram





In 2021-22 Scotland celebrates the 250th anniversary of Sir Walter Scott, the 'Great Scott' who popularised tartan, saved the Scottish banknote, rediscovered his country's Crown Jewels and, through a string of best-selling books that dominated the 19<sup>th</sup> century, changed how the world saw Scotland and Scotland saw itself. His legacy can still be experienced in the most extraordinary and unexpected places across Scotland, from castles to cashmere mills and from mountain tops to moments of mindfulness.

In this anniversary year, join our partnership by promoting an event, exhibition, learning initiative or product launch relevant to Scott's life and work.

If you would like to make a donation to the Scott 250 project, you can do so online here. All donations are gratefully received.

Scottish Borders Council Council Headquarters Newton St Boswells TD6 0SA



29<sup>th</sup> Dec, 2020

Dear SBC Planning

### **RE: Proposed Netherbarns Development AGALA029 in LDP2**

The Abbotsford Trust is writing to you to summarise its objections to the Netherbarns site being included in the Local Development Plan 2. This objection points out incorrect statements within the LDP relating to the site and its impact on Abbotsford, and is evidenced with new data and statistics.

It is our fervent desire that Scottish Borders Council will reject the Netherbarns development proposal, or failing that the Scottish Government will once again appoint a Reporter to review and overturn the decision.

We have based our objection on the National Planning Framework 3:

NPF3 recognises the contribution made by our cultural heritage to our economy, cultural identity and quality of life. Planning has an important role to play in maintaining and enhancing the distinctive and high-quality, irreplaceable historic places which enrich our lives, contribute to our sense of identity and are an important resource for our tourism and leisure industry.

The Abbotsford Trust objects to the development of the Netherbarns site because the associated light, sound and visual intrusions will impact adversely on its heritage assets, historic setting and the cultural landscape of the Scottish Borders and Tweed Valley. This impact will reduce the enjoyment of visitors to Abbotsford and reduce the economic contribution which Abbotsford makes to the region now and in the future.

#### I) LDP2 is based on incorrect information

The LDP2 is based on incorrect advice in the supporting Full Site Assessment of the Netherbarns site (pg 252). It concludes:

"These proposals confirm the site will not be visible from Abbotsford House during the Summer months and in the Winter months (when Abbotsford House is closed to the public) photomontages have shown that only fleeting views of very small parts of the site could be seen, but proposed housing (i.e. this would be a low density development of 45 units) would not be located within these visible locations"

This is incorrect for the following reasons:

a) It ignores the fragility of the mature tree screening on which the proposal is dependent, and which was made clear in Abbotsford's MIR objection of Feb 2019. This is based on professional advice received by the Trust with regard to management of the screening woodland in the Trust's ownership. It is unavoidable that sight lines to the development will be created as mature trees fall naturally or are felled as part of active woodland management.

Ownership of the scrub land on the old railway line has yet to be determined and therefore active woodland management at that location cannot be assumed.

Indeed, these very issues are raised by the Council's Landscape Architect in his Full Site Assessment report (pg 253):

"Before allocating the site we should require further visual assessment carried out in the winter months to test the conclusions of the recent appraisal. The supporting information lacks any assessment of the tree resource - a Tree Survey and Arboricultural Impact Assessment should be part of the information provided to support the allocation and to establish a realistic 'developable area'. It is clear if this site is allocated the protected trees along the south eastern boundary will be critical in protecting the core area of Abbotsford Designed Landscape from visual intrusion and a long term retention and management programme will have to be an intrinsic part of any such allocation."

b) It is incorrect to state that Abbotsford House is closed in winter, and misleading to suggest by this statement that visits to Abbotsford in the winter are negligible and of little value.

Abbotsford House is now open annually in Dec, forming a vital part of the Trust's strategy for increased visits and income year-round. Lights from Netherbarns will be clearly visible from the House at this time of the year. The Visitor Centre has been open all year since 2014.

Restoration of Scott's paths in 2018 has led to increased visits to walk Abbotsford's estate year-round. A 'people counter' sited on the paths at Abbotsford from July 2020 recorded 13,000 visits in Dec 2020 alone, and 84,000 visits since it was introduced in mid July 2020 (previous estimates were 20,000 walkers annually). 30% of Nov & Dec visits are from dusk when lights from Netherbarns would be particularly visible through the thin tree cover.

The marked rise in visits to Abbotsford's estate since the advent of Covid demonstrates the particular value of Scott's landscape as a place to escape to, refresh and energise. Accessible rural beauty spots on the fringes of urban settlements are increasingly rare and valued. Do not lose such a treasure just as it is most needed.

# 2) LDP2 does not properly assess Netherbarn's impact on Abbotsford's contribution to the region

The Scottish Government and Scottish Borders Council invested heavily in Abbotsford from 2007 in recognition of its existing and *potential* economic and cultural value to the nation.

The Abbotsford Trust is committed to realising this potential, but judging from the very considerable concern and comment directed to the Trust from visitors, community and donors, we are of the view that the Netherbarns development would negatively impact on those ambitions.

Data is now available on the value of Abbotsford to the economy, and is not referenced in LDP2 or its supporting documents.

During 2019/20 the South of Scotland Enterprise Agency (SOSE) in conjunction with VisitScotland and Scottish Enterprise approved the following assessment of Abbotsford's contribution to the regional economy:

• Abbotsford has welcomed over 160,000 paying visitors from July 2014 – 2019. A sustained annual increase in visits of 82%, contributing a total £7.4m to the local economy and supporting 148 jobs, plus creating 35 FTE direct new jobs at Abbotsford.

With the support of Scottish Enterprise, The Abbotsford Trust in 2019 adopted a strategic plan which includes the following goal:

#### Our place in the Community

We will be a catalyst for improving the life of our region by creating opportunities to positively affect direct and indirect employment, skills and employability, mental health, social isolation, learning and sense of identity.

This goal is dependent on a number of long term targets which include safeguarding Scott's landscape, improving the visitor experience, and increasing visits year round.

None of the above has been referenced in either LDP2 or its supporting documents, and yet our objections have made clear that we consider the development of the Netherbarns site as detrimental to achieving these targets.

Surely it is the purpose of National Planning Framework 3 to enable such ambition and potential?

## 3) Scott's 250<sup>th</sup> Anniversary & Year of Scotland's Stories - A building site when the eyes of the world are on Abbotsford?

We are grateful for the support of Scottish Government, SOSE and VisitScotland towards celebrating Scott's 250<sup>th</sup> Anniversary in 2021-22. Celebrations are being planned by an international partnership of 54 organisations led by Abbotsford, with Abbotsford at the centre of the visitor experience.

We have worked hard to secure TV and media interest in filming at Abbotsford over the next few years, and anticipate that aerial landscape drone footage will be a feature of most filming.

As the eyes of the world fall on Abbotsford during the Year of Scotland's Stories in 2022, how will we explain the sights and sounds of diggers which greet our international visitors?

Walter Scott believed that 'his oaks would outlive his laurels', i.e. that his landscape would be more precious and loved in the future than his books. Please do not let his 250<sup>th</sup> anniversary be the year Scotland proves him wrong.

We hope that we can forestall the site's inclusion in future Local Development Plans by putting forward our case, now and forever, on the detrimental impact of a development at Netherbarns on Abbotsford, the jewel in the crown of the Borders.

Yours sincerely,





Giles Ingram Chief Executive