From: Sent: To: Subject: Attachments:

24 January 2021 22:46 localplan Scottish Borders Local Development Plan 2: Proposed Plan

CAUTION: External Email

We attach comments from Scotland's Garden and Landscape Heritage in response to the above consultation.

With kind regards,

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Conservation Consultant Scotland's Garden & Landscape Heritage www.sglh.org



Scotland's Garden & Landscape Heritage

Forward Planning Scottish Borders Council Council Headquarters Newtown St. Boswells TD6 0SA By email only <u>localplan@scotborders.gov.uk</u>

24 January 2021

Dear Sir/Madam,

Scottish Borders Local Development Plan 2: Proposed Plan (PP)

AGALA029 Netherbarns, Galashiels

Having objected to the inclusion of the above site as an 'alternative option' at the Main Issues Report (MIR) stage of consultation for Scottish Borders Local Development Plan 2, Scotland's Garden and Landscape Heritage (SGLH), formerly the Garden History Society in Scotland (GHSS) remains opposed to the allocation of Netherbarns for 45 housing units due to the potential detrimental impact of the development on the Abbotsford designed landscape. Abbotsford is included by Historic Environment Scotland in the INVENTORY OF GARDENS AND DESIGNED LANDSCAPES IN SCOTLAND and is therefore considered to be of National Importance, and '*among the most significant designed landscapes in Scotland*'.

As the GHSS, SGLH opposed housing in this location in 2005, objecting to a proposed development of 89 houses at Netherbarns on the grounds that...'*it significantly adversely affects.....the setting of a site listed in An Inventory of Gardens & Designed Landscapes in Scotland*', contrary to policy BE3 of the then finalised Scottish Borders Local Plan. These plans were thrown out at Public Enquiry. Later that year GHSS (SGLH) therefore welcomed the deletion of the Netherbarns site from the draft Local Development Plan, following The Examination Report in which the potential impact of the proposal on Abbotsford House was recognised.

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Whilst we acknowledge that the number of housing units has now been reduced from 89 to 45, SGLH still considers development on this site as being contrary to National Planning, Local Planning and Historic Environment policies thus :

Scottish Planning Policy 2014

Policy Principles 137. 'The planning system should: • promote the care and protection of the designated and non-designated historic environment (including individual assets, related settings and the wider cultural landscape) and its contribution to sense of place, cultural identity, social well-being, economic growth, civic participation and lifelong learning'.

Managing Change in the Historic Environment: Designed Landscapes 2016

'Inventory sites often have a planned relationship with landscape features beyond their boundaries, and these surroundings may contribute to the way they are experienced, understood and appreciated. Land outwith the boundary may provide a backdrop to a mansion house or terminate a vista. This 'borrowed' land is used as a feature to be enjoyed from the Inventory site.'

'Development outside an Inventory site boundary may therefore impact on the site's setting - for example, if it would affect a deliberately planned outward view. Proposals should be carefully designed and located to minimise any such impacts.'

Scottish Borders Local Development Plan 2015

POLICY BE3 GARDENS AND DESIGNED LANDSCAPES 'Development will be refused where it has an unacceptable adverse impact on the landscape features, character or setting of: 1. Sites listed in the Inventory of Gardens and Designed Landscapes'.

Scottish Borders Proposed Local Development Plan 2 2020

POLICY EP10 GARDENS AND DESIGNED LANDSCAPES

'1.1 The aim of the policy is to protect the character of Gardens and Designed Landscapes from development that would adversely affect their special character...'

In 2017 The Abbotsford Estate Conservation Management Plan was commissioned from Peter McGowan Associates which clearly states that 'The view from the North Terrace, and from the North rooms of the house and from the haugh and riverside, continue to be unspoilt by development.... The view of the Netherbarns' bank and hillside is an outstandingly important part of the setting of Abbotsford and needs to be protected from intrusive development.'

Whilst it is stated that one of the Site Requirements for development of Netherbarns will be 'Reinforcement ... to the existing planting along the south eastern boundary of the site to further protect the setting of Abbotsford House' this is unlikely to offer sufficient screening, given that the existing planting is deciduous, offering reduced protection over the winter

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months and with new planting probably taking at least twenty years to develop as an effective screen. Furthermore, the screening effect is likely to be reduced as the existing mature trees are lost to old age, or possibly as a result of climate change. In the longer term further thinning of the screen will also be required if the Borders Railway is extended beyond Tweedbank towards Carlisle.

For the above reasons, Scotland's Garden and Landscape Heritage objects to the inclusion of AGALA029 Netherbarns, Galashiels as a site for housing in the Scottish Borders Local Development Plan 2 and requests that it be removed to protect the designed landscape of Abbotsford.

Yours faithfully,

Scotland's Garden and Landscape Heritage Conservation Consultant