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17 NOV 2019



14/1/19

**Dear Sir/Madam,**

**Re: Village Boundary Changes and Alternative Options for  
building. AEDNA011 + AEDNA013**

**I understand that these 2 sites are being put forward as optional sites for building in the new 'Local Plan' for Ednam, and have enclosed a copy of our previous objection to the consideration of the site AEDNA011. Nothing has changed in the intervening years, wildlife, flooding, mature trees, sewage, traffic which has increased hugely over the last 9 years, school size, historic sites, etc, etc.**

**I am objecting on the same grounds today.**

**The other site being considered, AEDNA013, while still altering the feel of the village enormously, would at least be on the same side of the very busy Duns Road as the school, football pitch and the play park, and would seem to make much more sense with a view to family homes being built.**

**Yours Faithfully,**



**Enclosure: Previous objection letter.**

Plans and Research Section,  
Planning and Economic Development Department,  
Scottish Borders Council,  
Newtown St Boswells,  
Melrose  
TD6 OSA



Dear Sir/Madam,

**SITE REF: - AEDNA001 (West of Millburn)**

Whilst we do not object to appropriate development in appropriate locations, and recognise the need for settlements to expand, we have serious concerns over the location, scale and impact of development proposed in Ednam.

### CONTEXT

Ednam is a settlement of 60-70 houses and, according to the 2001 Census, had a population of approximately 140. Ednam is currently served by a post office and primary school. The nearest shops are located in Kelso some 2.5 miles (4 km) away. The village is served by an infrequent and irregular bus service (No 85) between Greenlaw and Kelso.

SNH identify the Eden Water as a being part of the River Tweed, Forth and Borders Special Area of Conservation (SAC), being a tributary to the River Tweed and due to the presence of a number of internationally protected fish and mammals. The qualifying features of this SAC are:

- Atlantic salmon (*Salmon salar*) - Fish - International
- Brook lamprey (*Lampetra planeri*) - Fish - International
- Otter (*Lutra lutra*) - Mammals - International
- River lamprey (*Lampetra fluviatilis*) - Fish - International
- Sea lamprey (*Petromyzon marinus*) - Fish - International

The conservation objectives for this SAC are to, amongst other things, avoid the significant disturbance of the species.

Historic Scotland identifies a number of features of archaeological and architectural importance within and around Ednam, which form and contribute to the unique character of the village. Ednam Mains Farmhouse is identified as a National Monuments Record of Scotland (NMR) site (Ref:NT73NW.29), as is Eden House (Ref:NT73NW.51). Ednam Smithy is identified as a Category C(s) Listed Building. Ednam Bridge is identified as a Category B Listed Building. Ednam Church and Graveyard are identified as being Category B Listed.

The current Church is the third to have occupied the site. The first of which is believed to have been built by an English Knight Thor Longus around 1105 representing the earliest Scottish Parish. Further afield to the west is a Scheduled Ancient Monument (Piper's Grave, which is thought to be Bronze Age), to the east is Ednam Hill ROC Observation Post (NMR Ref:NT73NW.46.) and an Iron Age Fort

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(NMR Ref:NT73NW8). Other finds include Neolithic early bronze age features (Battle axe and worked object), an Iron bell (possibly dating from the later first millennium AD) and a coin hoard of 1471 silver coins were exposed during excavation for house building at Ednam in 1995. The coins were mainly English pennies of Edward I and II with Scottish pennies of Alexander III, John Baliol and Robert I, together with Irish and European coins making up one tenth of the total. Pottery shards were recovered and dated to AD 1322.

SEPA identify the Eden Water as being subject to flooding in a 1 in 200 year flood event. The Poppleburn is not identified on the indicative flood map as being subject to flooding, however, that is due to the indicative nature of this map and the assumptions made in its preparation. When the Eden Water is full, it can rise above the level that the culverted (under the road) Poppleburn joins the Eden Water, which in turn results in the Poppleburn backing up on the northern side of the road flooding the War Memorial.

Ednam lies within the Lowland with Drumlins Landscape Character Area (SNH Landscape Character Assessment - No 12) of the Scottish Borders. Within this area, the key landscape issues are considered to be, amongst other things, visual prominence of new build development on traditional ridge top sites; management/replacement of hedgerows; and pressure for expansion in traditional linear village plan forms.

The B6461 "Duns Road" enters Ednam from the south crossing a narrow bridge. Immediately after crossing the bridge, Cliftonhill joins it from the East at a point where the Duns Road turns 90° to the west. At the War Memorial there is a private access joining the road quickly followed by Eden Road, there is then a school on the west and a further access, Eden Park, joining from the east. All of this creates a situation where sharp turns, multiple access points and narrow carriageways make the road unsuitable for significantly higher levels of traffic. Indeed a number of recent accidents, including a lorry crashing through the bridge parapet, highlight this point.

## PLANNING

As part of the Alteration process, two sites at Ednam have been identified which could help meet the housing shortfall for the Central Housing Market Area (3,200 houses). Major redevelopment opportunities have been identified for Earlston and Newton St Boswells, which will accommodate the bulk of the requirement. Ednam falls within the "rest of the area" part, which is expected to accommodate some 200 houses.

A number of sites have been put forward in the Central Housing Market Area capable of delivering in excess of 5,000 dwellings in the period to 2018. Amongst these sites two are proposed in Ednam, if allocated, these would potentially deliver 37 dwellings representing some 18.5% of the requirement for the "rest of the area". This means that there are alternative, less constrained/sensitive and more effective sites within the "rest of the area" category better capable of accommodating the shortfall.

In any case, there appears to be a disparity in the increased density of the site at West Mill (12 dwellings on 1.5 hectares = 8 dwellings per hectare) and the proposed site at West of Millburn (25 dwellings on 1.5 hectares = 16.7 dwellings per hectare). The density applied to West Mill is representative of the character of the settlement, the higher density housing proposed on a north facing sloping site is neither representative of the settlement, nor deliverable when taking in to account all other issues to be addressed on site.

Both the Structure and Local Plans adopted the precautionary principle to the environment and recognise the importance of ecological networks and important habitats. National Guidance and Local Plan Policy state that development will not be located in areas at significant risk of flooding from any source, or where development would materially increase the probability elsewhere.

Scottish Planning Policy 7 (Para 42) states, "the potential for sites to flood **must** be taken in to consideration when preparing Local Plans". This requirement surely equally applies to the risk of materially increasing flooding elsewhere, and the Council should be satisfied that this is the case before allocating land. With reference to Sustainable Urban Drainage Systems (SuDS), SPP7 states that the primary role of these is to manage the flow of surface water and, through the use of detention ponds, store storm water to limit off site flood risk and to manage the water environment generally. SPP7 (Para 24 & 25) states that "culverts are frequently the cause of local flooding", and that "if a new development involves drainage by an existing culvert the applicant should demonstrate that the overall drainage provision would not add to the risk of flooding on or off site".

Scottish Planning Policy 3 sets out a number of requirements to be met in allocating land for development. It also requires that, when arriving at the proposed location of development, the Council should seek to reduce travel demand, particularly by the private car to assist in achieving the Governments carbon dioxide emissions targets.

## **OBJECTION**

We therefore object to site ref AEDNA001 - West of Millburn and request its removal from the plan. The Grounds for our objection are as follows:

- Better site more appropriate in scale and form for the settlement and its location.
- Better served alternative settlements within the Central HMA (rural part).
- Unclear impact of development and therefore question marks over its deliverability and effectiveness.
- Impact on wildlife/ecology (including European protected species).
- Impact on landscape (of buildings and streetlighting).
- Impact on local infrastructure (sewage & school)
- Impact on nearby watercourses.
- Impact on road network.

Nevertheless, should this site remain a preferred candidate site within the plan, we would expect the Council to request the following information from the Developer to demonstrate both his commitment to developing this site, and the Council's commitment to allocating land which is free from constraints in sustainable and appropriate locations.

- Archaeological Investigation & Watching Brief. Given the age of Ednam, and the historic finds uncovered during previous development in the area, we would expect a trenching exercise and evaluation to be requested at this stage before allocating land for development. Regardless of the outcome of this investigation the Council should request a watching brief over development to ensure that any finds can be evaluated at the time.
- Transport Impact Assessment. As well as modelling the impact of development on the junction of the Duns Road and the Cliftonhill Road, this

should inform the detailed access proposals for the site and internal road circulation. This would establish amongst other things the improvements to the local road network (traffic lights etc) and the amount of hedgerow to be lost.

- Landscape & Visual Impact Assessment. To assess the impact of this development on the landscape, and to assist in formulating the type, location and form of landscaping both within and around the site to ensure consistency with the locality.
- Drainage Impact Assessment (including SuDS) & Flood Risk Assessment. To demonstrate a commitment to applying the precautionary principle in respect of flooding and the environment. In particular this should demonstrate that the risk of off site flooding should not be increased by this development. This should also detail the size and location of the proposed SuDS Detention Ponds to ensure that they are sufficient to manage the surface water on site, and to avoid overloading and already inadequate culvert. This should also deal with the proposed method of dealing with foul water drainage as the current infrastructure is at capacity.
- Tree Survey in accordance with BS 5937 (Trees in relation to construction). This should cover the hedgerow fronting the site and the mature trees on the eastern boundary and should establish appropriate protective distances, which should be fenced off during construction. The survey will also identify the amount of hedgerow to be lost when forming the access and visibility splays.
- Design Brief & Illustrative Layout. Given the requirement to protect trees, the substantial SuDS ponds required, the highly visible nature of this sloping site a design brief and illustrative layout should be requested to show that the required elements can be accommodated, to guide its development and to minimise any adverse landscape impact.
- Ecological Survey. [REDACTED]

[REDACTED] the Council should request a detailed Ecological Investigation be commissioned, covering both the proposed site and the surrounding area. The Council's Biodiversity Officer and SNH should be consulted on the outcomes of this investigation and, should development be possible, agree mitigation measures.

Without this information it is difficult to understand how the Council can assess the effectiveness, deliverability, or ability of this development to meeting the housing requirements of the Central Housing Market Area (rural part) over the next 20 years.

Yours Sincerely,

[REDACTED]

Enc: Aerial Photograph  
SEPA Flood Map Extract  
Historic Scotland Extract



**PASTMAP** CONTACTS | HELP

- Scheduled Ancient Monuments**
  - < 1:50000
  - > 1:50000
- Listed Buildings**
  - 1m Precision
- National Monuments Record of Scotland**
  - 10km Precision
  - 1km Precision
  - 100m Precision
  - 10m Precision
  - 1m Precision
- Scottish Sites and Monuments Records**
  - > 1:25000
  - > 1:250000
- Gardens and Designed Landscapes**
  - < 1:50000
  - > 1:50000

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