

Response ID ANON-VDDE-RPZX-Q

Submitted to **Proposed Scottish Borders Local Development Plan**

Submitted on **2021-01-17 03:18:39**

About you

Are you responding as an: individual, group / organisation, agent?

Individual

Individual

What is your name?

Individual name:

B Dominic Ashmole

What is your email address?

Individual Email:

[REDACTED]

What is your address?

Address line 1:

[REDACTED]

Address line 2 :

[REDACTED]

Address line 3:

Town / city:

[REDACTED]

Postcode:

[REDACTED]

What is your contact telephone number?

Contact number:

[REDACTED]

Proposed Local Development Plan Menu

Where would you like to go?

Submit your response to the consultation (Exit)

Quick Comment / Supporting Information

Leave a quick comment about the Proposed Scottish Borders Local Development Plan, or planning and development in general.....

Quick Comment:

Do you wish to submit supporting information?

Submissions:

No file was uploaded

Where would you like to go now?

Proposed Local Development Plan Menu (includes Exit option)

Comment on Introductory Chapters or Appendices

Which Introductory Chapter or Appendix are you commenting on?

Context or Appendix:

2. The Changing Context and Meeting the Challenges for the Scottish Borders (P 11-14)

What are your comments regarding this Introductory Chapter or Appendix?:

The Strategic Environmental Assessment (Climatic Factors, p67) states: "the world average GHG footprint is 16.34" as compared to 17.02 tCO₂eq/capita in Scottish Borders. Intuitively it does not seem believable our per-capita footprint is only marginally above global average, given we live in a high-consuming, minority-world nation. A European Commission publication (<https://edgar.jrc.ec.europa.eu/overview.php?v=booklet2020>) in contrast states that global per capita emissions in 2019 were 4.93 tCO₂/capita/yr, implying our footprint is actually >3 times global average. If so, the figures in the SEA risk giving a very misleading impression and are unlikely to motivate Borderers to support the major changes/sacrifices required in meeting the Paris climate goals. Global/historical climate justice is coming into sharp focus as the climate emergency unfolds; accurate public information and understanding is essential.

What would you like to do now?

Comment on other Introductory Chapters or Appendices

Comment on Introductory Chapters or Appendices - page 2**Which Introductory Chapter or Appendix are you commenting on?****Context or Appendix:**

4. Vision, Aims and Spatial Strategy (P 19-22)

What are your comments regarding this Introductory Chapter or Appendix?:

Para 4.7 (Sustainability and Climate Change) makes no reference to SBC's recently declared Climate Emergency and provides no concrete details and targets regarding any planned emergency response. This is incredibly concerning, as it reinforces an impression of a "business as usual" approach incompatible with meeting the Paris climate goals. The reference to "adaptation" as a route to a low carbon economy is odd; perhaps "mitigation" was intended. Buildings must not only be designed to be "resilient to the effects of climate change" but also to a mitigating, Passivhaus-equivalent standard.

Which Introductory Chapter or Appendix are you commenting on?**Context or Appendix:**

8. Delivering Sustainability and Climate Change Agenda (P 33-36)

What are your comments regarding this Introductory Chapter or Appendix?:

Para 8.3 states that SBC "is promoting the installation and use of electric vehicle charging points" but does not provide evidence or reference a strategy document or plan. Given the high proportion of existing households without off-street parking, prospective EV owners are entirely reliant on the council to facilitate roll-out of at-scale, on-street charging facilities throughout residential areas and public car parks. Without published procedures, plans and timelines for this, rapid, widespread EV adoption is not feasible (particularly among lower-income groups) and private transport will not decarbonise quickly enough.

Para 8.6 acknowledges "a requirement to consider and address housing's contribution to Climate Change" but it is apparent that only incremental change and pilot schemes are underway. The LDP should respond definitively to the recent Infrastructure Commission for Scotland Key Findings Report which states:

- "By 2022, the Scottish Government, local authorities, regulators and industry should work together to establish the viability, incentivisation mechanisms and a route map for the transition to net zero carbon that... addresses heating for domestic, commercial and public buildings" (p10) and
- "As a result of the scale of energy used for heat, housing and related space heating are the dominant building sector challenges. This is primarily an issue of retrofit..." (p22)

Given the low current and expected rate of new-build housing, meeting the Paris climate goals will require a vast retrofit programme for energy efficiency and zero-carbon heating systems throughout the region's existing housing stock. The LDP should provide a definitive timescale for the publication of plans to achieve this.

Para 8.14 refers to the 2005 Scottish Borders Woodland Strategy (and associated 2012 Technical Note) commenting that "the Scottish Government has set targets for woodland creation to help achieve climate change objectives" and "the Council is encouraged to consider a strategic approach". It is unclear that the progress monitoring proposed in the 2005 Strategy has been carried out and, if so, where the results are published. It is therefore hard to assess how significant an impact on climate objectives has been achieved over the past 15 years, and the wording of Para 8.14 does not convey any sense of urgency or a proactive stance by the Council.

A recent McKinsey report (<https://www.mckinsey.com/business-functions/sustainability/our-insights/climate-math-what-a-1-point-5-degree-pathway-would-take>) states:

"Over the next decade, a massive, global mobilization to reforest the earth would be required to achieve a 1.5-degree pathway. In our scenarios, reforestation represents the key lever to compensate for the hardest-to-abate sectors, particularly for pre-2030 emissions. All the scenarios we modeled would require rapid reforestation between now and 2030. At the height of the effort in that year, an area the size of Iceland would need to be reforested annually."

Given the Council's recent Climate Emergency declaration, much stronger wording should be included indicating what emergency measures are planned to ensure the region's undoubted potential in this area will be urgently realised.

Which Introductory Chapters or Appendix are you commenting on?**Context or Appendix:**

What are your comments regarding this Introductory Chapter or Appendix?:

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What are your comments regarding this Introductory Chapter or Appendix?:

Comment on Policies

Which Policy are you commenting on?

Policy:

Policy EP16 Air Quality

What are your comments regarding this Policy?:

The claim in Para 1.1 that “The Scottish Borders has no areas where air quality is an issue” is not evidenced, and seems to be a slight overstatement. For example, localised pollution around intensive poultry operations certainly exists, and the generally harmful practice of muir burning can cause issues on a seasonal basis.

Para 1.2 refers to “gases such as CO2 which have been linked to climate change”. This almost sceptical wording should be changed to “are known to cause harmful climate change”.

Policy EP16 makes no mention of greenhouse gas emissions, despite the pre-amble paragraphs indicating this is in scope. The phrase “or lead to unsustainable levels of GHG emissions” should be inserted into the policy wording.

What would you like to do now?

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