

South of Scotland Enterprise



Scottish Borders Council  
Forward Planning

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25 January 2021

Dear Sir / Madam

### **Scottish Borders' Local Development Plan**

Thank you for the opportunity to comment on the Scottish Borders' Local Development Plan. We recognise the importance of this plan, and its statutory status. In acting to guide and shape how the area will develop across the next decade, it clearly has a key role to play in enabling the growth and change we collectively wish to see to realise our ambition for a stronger, fairer and greener future for the South of Scotland.

Overall, we welcome the process to develop the Plan and that its focus, in terms of key objectives, is generally responsive to the area's needs and opportunities.

In terms of strategic context, it is important that the Plan recognises the role of the Scottish Borders beyond its functional relationship with the Edinburgh City Region, recognising too the importance of the area in the context of the wider Borderlands and as a core component of the South of Scotland region. We feel this could be strengthened in the Plan.

The South of Scotland is now increasingly being looked at as a single entity rather than two parts, aided by a new landscape of public sector agencies and partnerships. The establishment of SOSE; a newly constituted Regional Economic Partnership; and the Convention of the South of Scotland which affords a new and strengthened relationship with Government; collectively ensure the region is empowered and has the leadership and capacity to drive and accelerate change in a way like never before. This opportunity must be embraced and amplified at every possible opportunity, with the Team South of Scotland mentality which has brought together key partners in response to the global COVID-19 pandemic testament to how well the south can work together and how much louder its voice can be from doing so.

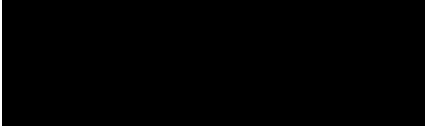
Now more so than ever, it is important that the Plan strikes an appropriate balance between affording the certainty needed to aid investment and other decisions whilst at the same time allowing for flexibility. As we recover from the global COVID-19 pandemic, adjust to the impact of our exit from the EU and embrace the pace of change needed to ensure a just transition to net zero, our plans will need to be agile. We will need to act swiftly to counter unforeseen issues and too to capitalise on newly presented opportunities. Pragmatism will be essential and a can do attitude key to conveying that our

region is up for growth and open for business. As drafted, we are pleased to note and welcome that such commitments are explicit within the Plan.

I know that SOSE officials welcomed the opportunity to talk through our more detailed comments directly with those council officers responsible for preparing the Plan and have offered some drafting comments on points of detail. If necessary or helpful however, we would be more than happy to discuss and elaborate further.

Finally, may I take this opportunity to wish you and the team well for progressing the Plan through the next key stages towards a timely adoption.

Yours faithfully



**Professor Russel Griggs OBE**  
**Chair**  
**South of Scotland Enterprise**

Encl - Detailed observations on the Scottish Borders Local Development Plan

## Detailed Observations on the Scottish Borders Local Development Plan

- The vision at the heart of the Plan is that for the Edinburgh City Region. Whilst many elements are evidently relevant for the Scottish Borders, the opportunity appears to have been missed to put a genuinely distinctive vision at the heart of the Plan. It is silent for example on Borderlands which as the plan acknowledges elsewhere will be a major source of investment across the next decade. It is also silent on the renewed focus on the South of Scotland as a region, amplified by the creation of SOSE, the establishment of the new Regional Economic Partnership and initiatives including the Scotland Starts Here place brand adopted by Visit Scotland and the South of Scotland Destination Alliance. Work on the South of Scotland RSS also acts to amplify the importance of looking beyond simply north to Edinburgh. It is considered important for the Plan to acknowledge this strategic context at its outset and throughout i.e. that despite being part of the Edinburgh City Region the area looks to, has a functional relationship with and is an important part of wider regions too.
- The grouping of the plans aims around the themes of communities, growing the economy and sustainability works well and aligns well with SOSE's statutory duties as defined by the SOSE Act (2019). The main aims themselves are broadly supported.
- The aim for the Rural Environment (and paragraph 5.11 within the LDP) is supported and particularly the need for flexibility, recognising that post Brexit, and owing to the net zero transition, greater flexibility than ever before may be needed to support land and enterprise diversification in rural areas. The aim could however be amended to talk more positively about and be more explicit in referencing new opportunities including for example Natural Capital, particularly given this is a key focus of the Borderlands Inclusive Growth Deal and is at the heart of the Scottish Governments Programme for Government and economic recovery planning.
- It is noted that the Spatial Strategy will see strategic growth in the Scottish Borders directed to three Strategic Development Areas in the Central, Eastern and Western Borders, and that larger settlements within these Strategic Development Areas should be the focus for retail, commercial and strategic opportunities. This strategy is that most logical and hence, particularly given stated objectives to improve connectivity between and to wider larger population centres, is broadly supported. As the plan itself acknowledges however, particularly given the uncertainties arising from the global Coronavirus pandemic and Brexit, greater flexibility in comparison to previous LDPs will likely be required, particularly in relation to ensuring the sustainability, vitality and attractiveness of more remote rural and some coastal communities. Such an approach will be critical to ensuring future housing and economic growth are genuinely inclusive with all communities across the area afforded the opportunity to benefit from proportionate future investments.
- The Plan talks explicitly (for example at Para 3.8) about the importance of improved connectivity particularly north to Edinburgh and south to Newcastle and Carlisle – described as being essential for the future economic growth of the area. It appears silent however on improved east-west connectivity, which is well documented as being important for the wider South of Scotland region and its communities.
- The LDP rightly recognises the challenges and uncertainties presented by the Coronavirus (COVID-19) Pandemic, which is welcomed. The commitment at Para 2.8 of the LDP which states that *"implications Covid 19 may be having on, for example, the economy, performance of town centres, business recovery, house building, health and well-being will be addressed as part of the decision making process for relevant planning applications"* is equally welcomed, as are additional references

throughout the LDP. This reflects that economic recovery efforts and indeed the emergence of new opportunities post the pandemic, will likely require more flexibility than the LDP presently allows for.

- Similar flexibility may also be required with respect to facilitating a just transition to net zero, recognising the pace and nature of change required. It is important that the Plan acknowledges this and embraces and is perhaps more explicit about the need for a Just Transition to Net Zero. Emerging ambitious Government targets relating to decarbonising heat in residential properties require timely and significant upgrades to the existing electricity network to facilitate, as does the roll out of electric charging points. It is important the principle of such upgrades are supported by the LDP to provide the required confidence for providers to invest in developing and deploying plans. It will also act to support the realisation of significant growth opportunities associated for example with the roll out of air and ground heat pumps, for which the South of Scotland is well positioned to be a national leader.
- The specific aims relating to growing the economy are broadly supported, namely to:
  - Provide an adequate range of sites and premises for business/industrial uses
  - Promote economic development opportunities along the railway corridor
  - Promote the regeneration of town centres to make them vibrant and viable focal points within our communities
  - Maximise and promote the Scottish Borders tourism potential and build a strong visitor economy
  - Ensure the delivery of adequate infrastructure to satisfactorily serve developments
- With respect to future economic development opportunities it is important to recognise that many of these will be associated with tourism, natural capital, energy and food and drink including agriculture, and by their very nature be beyond the defined strategic areas, existing industrial sites and remote from the railway corridor.
- Home working (amplified by the global Coronavirus pandemic), which the plan currently appears silent on, could arguably be as important as more traditional employment sites going forward. Similarly, the Scottish Borders area has amongst the highest rate of self-employed people within Scotland, who may require access to smaller lock ups or adequate provision within their homes to undertake their business. The LDP could include provisions to support this key future economic trend, which going forward may be key to attracting people to live in the area, including for example measures to be adopted in new housing developments.
- The LDP highlights at Para 5.9 the use of Simplified Planning Zones to allow certain developments for example within business parks without having to apply for planning consent. The use of these and other planning freedoms will be of elevated importance over the next decade to aid the regions competitiveness particularly as it recovers from Covid-19, as well as in enabling the pace of change required including that associated with upgrading the electricity grid to allow decarbonised heat targets and those relating to electric vehicle uptake to be met.
- Reference to the South of Scotland Economic Partnership (SOSEP) should instead be replaced with South of Scotland Enterprise Agency, at Para 1.4 in the supporting text to Policy ED1 which presently reads *“Consultation with the Council’s Economic Development Service, Scottish Enterprise (SE) and*

*the South of Scotland Economic Partnership (SoSEP) will often be necessary to assist decision making...*

- Para 1.4 on Page 65 states that *“It is anticipated that the new South of Scotland Enterprise Agency, which will become operational in April 2020, will continue this place based approach to drive the local economy of the Scottish Borders and the South of Scotland with the aim of enhancing the area to be more attractive to businesses, investors, visitors and residents”*. This reference is supported but the tense could be updated to reflect that SOSE are now live.
- Para 5.10 states that *“...The creation of a new South of Scotland Enterprise Agency covering Dumfries and Galloway and the Scottish Borders offers a once in a generation opportunity to increase the level of investment in economic growth, skills and innovation. It is intended that the new Agency will closely align its work with Scottish Enterprise, Skills Development Scotland, Scottish Funding Council and Visit Scotland”*. We suggest amending this to *“The creation of a new South of Scotland Enterprise Agency covering Dumfries and Galloway and the Scottish Borders offers a once in a generation opportunity to drive inclusive economic growth, skills and innovation across the region. SOSE will be a key part of Team South of Scotland, working to deliver the agreed Regional Economic Strategy.”*