

## Response ID ANON-VDDE-RA13-T

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

Submitted on 2021-01-25 23:41:52

### About you

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

Individual

### Individual

What is your name?

Individual name:  
Francine Hardwick

What is your email address?

Individual Email:  
[REDACTED]

What is your address?

Address line 1:  
[REDACTED]

Address line 2 :

Address line 3:  
[REDACTED]

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:

I object to the adoption of most of the proposed Local Development Plan for the following reasons:

1. A climate emergency has been declared nationally in Scotland and the UK, and also in the Scottish Borders. This plan inadequately reflects the current and developing thinking on required responses to planning, in a climate emergency, so as it stands, the Plan is not fit for purpose;
2. Time is running out to reduce carbon emissions in Scotland by 75% by 2030. This plan has not been thought out in sufficient detail to achieve these targets, and so is not fit for purpose;
3. The Scottish Government is currently working on new policies for future regional development plans, fit for purpose for a climate emergency between now and 2030. There is also a Citizens Climate Assembly currently putting together recommendations for Scottish Government to adopt, in response to the climate crisis and the need to reduce emissions in all spheres of life. The current best advice on homes, communities, waste, energy, diet and lifestyle, food production, work, travel and transport, community services etc. I suggest that those involved in producing Local Development Plans might avail themselves of this information first. Access to new videos produced by expert evidence givers on all these subjects for the Assembly can be found on this website - <https://www.climateassembly.scot/>

Click on link

Click on 'meetings' in top line of topics

Then click on the 'weekends'. Each takes you to a new site, where there's the agenda for that weekend and the video presentations sharing info on the different topics. Excellent resources.

I also attach in the supporting information, a document written by another party, that highlights flaws in the proposed LDP, given the ongoing climate emergency and the measures required to address the climate crisis. I support this document and commend it to you.

### **Do you wish to submit supporting information?**

#### **Submissions:**

Climate emergency -LDP2CommentsDraft2\_1\_.01.docx 2.doc 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:**

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

#### **What would you like to do now?**

Proposed Local Development Plan Menu (includes Exit option)

## **Comment on Sites in Settlements F to H**

### **Which Site are you commenting on?**

#### **Settlements F to H:**

Galashiels: AGALA029: Netherbarns: Housing

#### **What are your comments regarding this site?:**

The site lies adjacent to the boundary of the Inventory of Gardens And Designed Landscapes Scotland (GDLS) associated with Sir Walter Scott's designed landscape, which extends to the strip of land with trees on the NETHERBARNs BANK OF THE TWEED.

Clearly, this is a highly sensitive landscape which needs to be protected, in spite of all the history of pressures put on council planning department by the developer to approve this land for development. This has also entailed the extension of the Galashiels settlement boundary, causing creep of suburban development into a previously rural area. Shame on this decision!

The setting of the designed landscape, as viewed from Abbotsford, has already been abused by the Kingsknowes development, which is clearly visible through the trees on the boundary of the GDLS.

However, in the case of Netherbarns, I see that the council has now prepared a new site plan that shows a large area where there is to be no development. This would help to make some development outside of that area acceptable. However, 45 buildings of unknown description and unlikely to be of the new zero carbon standards required by the ongoing climate emergency, is far too many for the area of land proposed for development.

Furthermore, there should be measures in place to ENSURE and GUARANTEE that no development can ever be allowed on that designated area marked 'no development in this area' in order to protect the sensitive boundary adjoining the GDLS.

I understand also that Save Scotts Countryside has put forward a "semi-rural solution" to the long arguments over this 'debatable land' which the council seems determined to approve, to satisfy the pressure they are under from the developer, in spite of a long history of objections and public inquiries...

It is proposed that SSC runs a national Competition For A Masterplan for a much more modest development to proceed. This should be supported by the council. Such a pilot project could be a model of excellence - climate emergency assured - that other regions could follow.

#### **What would you like to do now?**

Comment on other Sites in F to H settlements

## **Comment on Sites in Settlements F to H - page 2**

### **Which Site are you commenting on?**

#### **Settlements F to H:**

**What are your comments regarding this site?:**

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**What are your comments regarding this site?:**

**What would you like to do now?**

Proposed Local Development Plan Menu (includes Exit option)

## **Comment on Sites in Settlements I to O**

**Which Site are you commenting on?**

**Settlements I to O :**

Melrose: AMELR013: Harmony Hall Gardens: Housing

**What are your comments regarding this Site?:**

I object to any development taking place on this site which is within the conservation Area of Melrose, a valued community resource and an attractive open green space, which enhances the character of the settlement and should be protected from housing development.

Buildings here would detract from the settings of Melrose Abbey and Harmony Hall, and cause damage to existing trees and the boundary wall.

The planning department cannot once again bend all the policies that are in place to protect sensitive sites like these, and neglect to apply them, as they have done in the case of the Croft site - EM4B The Croft 2.4 25 and the former Dingleton Hospital site - EM32B Dingleton Hospital 23.6 230 where development has been and is to be approved, causing appalling damage and scarring to highly sensitive landscapes. Planning must refrain from being responsible for such blunders in the future.

**What would you like to do now?**

Proposed Local Development Plan Menu (includes Exit option)

# Local Development Plan (LDP2) and the Climate Emergency

Congratulations to Council for their leadership on sustainability and these major milestones:

- ⇒ Jan 2020: Creation of the Sustainable Development Committee (SDC)
- ⇒ Aug 2020: Commitment to UN Sustainable Development Goals (SDG)
- ⇒ Sep 2020: Declaration of a climate emergency.

## Executive Summary

- **LDP2 will set development policy for the next decade – it must reflect the climate emergency.**
- Scotland's 2020 review of SDG targets adopted in 2015 shows biodiversity targets were missed. Scotland committed to the step change needed to hit 2030 targets, informed by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES).
- IPBES is clear: only transformative change hits 2030 targets – business as usual means failure.
- SDGs are transformative: economics is no longer the overarching consideration; rather the economic, social and environmental dimensions are seen as indivisible and balanced.
- Expressing our commitment to sustainability necessitates multiple changes to LDP2 Volume 1:
  - ⇒ Foreword: change 'economic growth' to UN SDG economic, social and environmental; and adopt sustainable development objective from UN General Assembly Resolution 42/187
  - ⇒ Council's pledge to implement the UN SDGs is elevated to their correct status as an overarching set of goals and fully incorporated into Part 1 (detailed changes set out below)
  - ⇒ Statements in Part 1, sections 4 and 8.5 would undermine the role and function of the SDC. These must change for the SDC to fulfil its mission.
  - ⇒ Part 1, section 8.14: calling an immediate halt to the destruction of pockets of woodlands within Borders towns would be a highly symbolic, popular gesture, with no associated cost.

## LDP2 sets the agenda for the next decade: it must reflect the Climate Emergency

Council is to be commended on its production of such a comprehensive local development plan, balancing so many diverse views and covering such a wide-ranging legal framework. I applaud the Council and its SDC for its declaration of a climate emergency (25-Sep-2020).

There is, however, one glaring omission: LDP2 fails to mention the climate emergency.

At Aichi 2010, the world set 20 targets to prevent biodiversity loss. In 2014, NPF3<sup>1</sup> committed Scotland to delivering these targets, yet along with the rest of the world, Scotland missed these targets, resulting in what the RSPB described as "a lost decade for nature".<sup>2</sup>

Given that LDP2 will set the development agenda in the Borders for the next decade, this omission must be rectified. As Councillor Shona Haslam said (18-Sep-2020):<sup>3</sup>

"Any declaration of a climate emergency cannot be a hollow gesture – it must be backed up by action and it is essential that a suitable target is put in place and a plan developed to reach it."

## Scottish policy commits SBC to transformative change – not business as usual

The climate emergency and the legislative requirement that SBC contribute to meeting the UN Sustainable Development Goals (SDG) are not new.

- The First Minister committed Scotland to the UN SDG in July 2015.<sup>4</sup>
- In June 2014, the NPF3 committed Scotland to "fully contributing to meeting UN Aichi goals and targets for biodiversity" by 2020 (pg 83).<sup>1</sup>
  - NB: The Aichi goals on preventing biodiversity loss were set in 2010 and have now been incorporated as the biodiversity goals of the UN SDG.
- The Scottish Government's review of its performance against the UN SDG (July 2020):<sup>5</sup>
  - Shows that Scotland missed its Aichi biodiversity targets, and "... evidence suggests that Scotland's biodiversity is already experiencing a changed climate, affecting species abundance, distribution, their food sources, breeding and ability to adapt" (pg 197)

- Commits the Scottish Government to “... a careful consideration of the recent IPBES global biodiversity assessment”, assessing “... what more needs to be done”, which “... will inform a step change in the Government’s programme of work to address biodiversity loss” (pg 198).
- The IPBES is the definitive reference for the state of biodiversity globally. Its latest summary for policymakers<sup>6</sup> sums up the state of biodiversity in four **key messages**:
  - A. “Nature and its vital contributions to people, which together embody biodiversity and ecosystem functions and services, are deteriorating worldwide.
  - B. Direct and indirect drivers of change have accelerated during the past 50 years.
  - C. Goals for conserving and sustainably using nature and achieving sustainability cannot be met by current trajectories, and goals for 2030 and beyond may only be achieved through **transformative changes**<sup>†</sup>
    - †A fundamental, system-wide reorganization across technological, economic and social factors, including paradigms, goals and values.
  - D. Nature can be conserved, restored and used sustainably while other global societal goals are simultaneously met through urgent and concerted efforts fostering transformative change.”

Policy is clear: the climate emergency is real and we must change our goals to avert disaster. Business as usual would result in 10% of all **species** on Earth being lost by 2050<sup>7</sup>. Scottish policy commits us to the transformative changes necessary to safeguard the wellbeing of current and future generations.

Council has resolved to embrace the UN SDGs on 25-Sep-2020.<sup>8</sup> In line with Scottish policy requirements, and in accordance with SBC’s declaration of a climate emergency, please update the LDP2 to reflect the urgency of the issues and the commitment to making the step changes required by explicitly referencing the UN SDG throughout the LDP2.

### Changes to LDP2 Volume 1 foreword (pg 5)

The statement in paragraph 3 that “SBC is committed to sustainable economic growth” is not aligned with Scottish Government policy. The correct position would be for SBC to align with Scottish Government policy in its commitment to all 17 of the UN SDGs.

Privileging goal 8 (economic growth) over all 16 other SDGs would be to perpetuate the very reasons why we are now in a climate emergency.

For example, in March 2019, the UK reported<sup>9</sup> that it was on track to miss 14 of the 20 Aichi 2010 targets. RSPB’s analysis is that the reality is much worse, describing this as “a lost decade for nature”.<sup>2</sup>

Paragraph 3 should start by echoing the NPPF<sup>10</sup> (pg 5):

“The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.” [Resolution 42/187 of the United Nations General Assembly]

Followed by a commitment to all 17 of the UN SDGs, e.g. paraphrasing the SDG preamble:<sup>11</sup>

SBC is committed to “... a plan of action for people, the planet and prosperity ... to heal and secure our planet. We are determined to take the bold and transformative steps which are urgently needed to shift the world onto a sustainable and resilient path. ... The 17 SDGs ... demonstrate the scale and ambition of this new universal Agenda. They seek to build on the Millennium Development Goals and complete what these did not achieve. ... They are integrated and indivisible and balance the three dimensions of sustainable development: the economic, social and environmental.”

## Changes to LDP2 Volume 1, Part 1

**“The Council pledges to implement the United Nations SDGs as they relate to local government.”**

To be consistent, this pledge (LDP2, Volume 1, part 2, 1.2, pg 40) and the UN SDGs must be elevated to their correct status as an overarching set of goals and fully incorporated into Part 1.

### 2. The changing context (pg 11)

Please add a section mentioning the declaration of climate emergency, e.g. before 2.7.

#### Coronavirus (pg 13)

Please commit to ensuring that measures introduced for Coronavirus do not impact on measures necessary to address the climate emergency. For example, that reduced public scrutiny of development applications will only apply for new applications, i.e. not in cases where developers have either had applications rejected, or withdrawn applications to avoid rejection.

### 3. Policy Background (pg 15)

Please update to reflect the policy mandate for UN SDGs outlined above.

### 4. Vision, Aims and Spatial Strategy (pg 19)

The Scottish Government committed to the UN SDG in July 2015, so this section must be framed in terms of that commitment. The order of aims 4.2 to 4.7 is important. It is no accident that the list begins with “Growing our economy”, while in last place we have “Sustainability and climate change”. If the intention is to take a balanced approach, ensuring that sustainability is not sacrificed for economic growth, then this section should:

- State that a balanced approach per the UN SDGs will be taken
- That the order of these objectives in no way indicates priority; or consider reversing the order
- Map each aim to the relevant SDG number(s).

A clear statement that economic considerations do not trump sustainability is necessary when cross referencing to the statements in 8.5 (pg 34) to the lack of relevance of the SDC’s targets and the “practical view” the committee will need to take.

### 5. Growing our economy (pg 23)

Append “(UN SDG 8)” to the title of this section.

Add paragraph explaining how the aims and objectives in this section meet UN SDG 8.

### 6. Planning for Housing (pg 27)

Append “(UN SDG 11)” to the title of this section.

Add paragraph explaining how the aims and objectives in this section meet UN SDG 11.

### 7. Supporting our town centres (pg 29)

Append the appropriate UN SDGs (8, 9, 10 and 11) to the title of this section.

Add paragraph explaining how the aims and objectives in this section meet the corresponding SDGs.

### 8. Delivering Sustainability and the Climate Change Agenda (pg 33)

Append “(UN SDG 13, 14 & 15)” to the title of this section.

Add paragraph explaining how the aims and objectives in this section meet UN SDG 13, 14 & 15.

#### 8.4 SDG (pg 34)

Given the Scottish Government’s commitment to an evaluation against the IPBES, section 8.4 should be moved to the top of this section (8.1) and reworked to include:

- The key messages from IPBES (outlined above)

- Key messages from item 3.1 of the minutes of the sustainability committee 4-Sep-2020,<sup>12</sup> report from CEO of Borders Forest Trust and Chair of Scottish Environment e.g.:
  - “in 2019, the UN-established IPBES released a global assessment of humanity’s relationship with nature. This was written by more than 500 experts from over 100 countries. It concluded that **such was the rate of decline that the risks posed by biodiversity loss should be considered on the same scale as those of climate change.** This alarming trend endangered economies, livelihoods, food security and the quality of life of people everywhere. It was estimated that we were losing around 135 plant, animal and insect species every day. The seven principle drivers of loss were identified as: changing use of the land and sea; over-exploitation of species; climate change; pollution; invasive non-native species; indirect effects arising from people’s disconnect with nature; a lack of value and importance placed on nature.”
  - “SNH’s the State of Nature Scotland report 2019 revealed that, since recording began, 49% of Scottish species had decreased...”
  - “Between the 1940s and 1980s the area of broadleaved and mixed woodland fell by 23% and 37% respectively and native Caledonian pine forests now covered less than 90,000 hectares – just over 6% of the original area.”

### *8.5 Sustainable Development Committee (SDC) (pg 34)*

This section reflects poor organisational design. Given the privileging of economic considerations noted above re: 4, the reference to SDC targets as irrelevant and the emphasis on the need for practicality, this section undermines the SDC’s role and importance and sets it up to fail.

This section must be replaced with a statement that underlines the fundamental role the SDC plays and the indivisibility of economic, social and environmental goals.

Paraphrasing the IPBES: how long will we maintain a strong economy if we kill the planet? Yes, the issues really are this serious. We are out of time.

### *8.13 Biodiversity (pg 36)*

Update to reflect failure to meet the Aichi targets and Scottish policy commitment to them as part of the UN SDG, referencing IPBES.

### *8.14 Woodlands (pg 36)*

“The overall average woodland size in Scottish Borders is 30 ha.” (Pg 15, SBWS).<sup>13</sup>

This makes the pockets of woodlands in Borders towns not just a unique and distinctive part of our natural and built environment, but important for their biodiversity value in their own right. In several towns they link key green spaces and conservation areas, forming strategic wildlife corridors connecting the hearts of our beautiful towns to the wild spaces nearby. For many, this connection to nature is what makes our community spaces such a vibrant place to live and work.

Given the declaration of the climate emergency, one immediate and practical step SBC can take is to declare an immediate halt to the destruction of any pockets of woodlands within Borders towns. This is completely consistent with existing strategy (SBWS) and should involve zero cost to either the public or private sector as we are essentially talking about woodlands in conservation areas.

Ultimately, what we do matters even more than what we say. We simply cannot afford another lost decade for nature. In recognition of the climate emergency, please ensure that the LDP2 – which will be used as the rulebook for development over the next decade – fully embodies the UN SDGs. The good men and women of SBC need a strong and principled LDP2 to ensure that they represent the public good fairly when balancing powerful economic interests with the wellbeing of our society and the health of our environment.

Yours sincerely,



## References

1. Scotland's Third National Planning Framework, 23 Jun 2014. Available at: <https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2014/06/national-planning-framework-3/documents/00453683-pdf/00453683-pdf/govscot%3Adocument/00453683.pdf>.
2. RSPB. A lost decade for nature, 2020: Available at: [http://ww2.rspb.org.uk/Images/A\\_LOST\\_DECADE\\_FOR\\_NATURE\\_tcm9-481563.pdf](http://ww2.rspb.org.uk/Images/A_LOST_DECADE_FOR_NATURE_tcm9-481563.pdf).
3. Councillor Shona Haslam, 18 Sept 2020. Available at: [https://www.scotborders.gov.uk/news/article/3930/council\\_to\\_build\\_upon\\_steps\\_already\\_taken\\_to\\_help\\_tackle\\_climate\\_change](https://www.scotborders.gov.uk/news/article/3930/council_to_build_upon_steps_already_taken_to_help_tackle_climate_change).
4. Scottish Government, Information on the United Nations Sustainable Development Goals. Available at: <https://nationalperformance.gov.scot/sustainable-development-goals>.
5. Scotland and the sustainable development goals: a national review to drive action, 30 July 2020. Available at: <https://www.gov.scot/publications/scotland-sustainable-development-goals-national-review-drive-action/>.
6. IPBES. Global Assessment Report on Biodiversity and Ecosystem Services. Available at: <https://ipbes.net/global-assessment>.
7. David Leclère D, Obersteiner M, Young L. Bending the curve of terrestrial biodiversity needs an integrated strategy. *Nature* 2020;585:551–556. Available at: <https://www.nature.com/articles/s41586-020-2705-y>.
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10. Ministry of Housing, Communities and Local Government [England]. National Planning Policy Framework, 2019. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)
11. UN Department of Economic and Social Affairs. Transforming our world: the 2030 Agenda for Sustainable Development. Available at: <https://sdgs.un.org/2030agenda>.
12. Scottish Borders Council Sustainable Development Committee. Agenda and draft minutes. 4 Sept 2020. Available at: <https://scottishborders.moderngov.co.uk/ieListDocuments.aspx?CId=468&MId=5140&Ver=4>.
13. Scottish Borders Council. Scottish Borders Woodland Strategy, 2005. Available at: [https://www.scotborders.gov.uk/downloads/file/1681/scottish\\_borders\\_woodland\\_strategy](https://www.scotborders.gov.uk/downloads/file/1681/scottish_borders_woodland_strategy).