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**From:** [REDACTED]

**Sent:** Wed, 3 Feb 2021 02:47:47

**To:**

**Cc:**

**Subject:** St Boswells Parish Community Council: comments on the draft Local Development Plan

**Sensitivity:** Normal

**Attachments:**  
[REDACTED]

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CAUTION: External Email

Mr [REDACTED]

I am aware that the deadline for receipt of submissions has passed, and that the consultation ran for 12 weeks rather than just the statutory minimum of 6. Nevertheless I hope you may still be able to give some thought to these comments. The StBPCC has no meeting in December, and consequently discussed the LDP2 Draft on Thursday night at their first meeting of 2021.

They agreed to endorse the paper circulated by [REDACTED] which we understand has also been adopted by the Peebles Community Council. Please let me know if you require a copy of [REDACTED] paper, which deals in some detail with matters including the Climate Emergency and the importance of Sustainable Development.

I had also circulated to the StBPCC some notes of my own, primarily focused on Volume 1 of LDP2, and I attach a copy for your interest. The CC drew from these notes some points which they wished to particularly highlight, namely

- 1 They are keen to contribute to the railway expansion proposals development discussion, so that they understand fully any challenges and opportunities which may be presented by this major development.
- 2 They believe that enhancement of the village should be included in LDP2 through something akin to a Conservation Area Management Plan, which might also address the issues of bus and other traffic matters and
- 3 They wish to support the production of a Management Plan for the Eildon/Leaderfoot National Scenic Area.

Finally, I still hope also to draw up some comments on the SEA , the consultation period for which I appreciate ran parallel with that of LDP2 itself. So they will be significantly late and you may be unable to consider them as competent, but I shall send them anyway for your interest.

The totality of documentation of this LDP2 draft must extend to around 1000 pages, and responding to this would be challenging at the best of times, never mind in the midst of a pandemic with lockdown, which I know also can only make your job and those of your team even more challenging.

Best wishes

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Local development plan

LDP SBC Comments from CAS January 2021

## **Foreward**

It doesn't seem terribly clear whether the timeframe for the plan is 10 years or five years. If the plan period is for 10 years then it will be necessary to address climate change, the climate crisis, in a far more direct way.

The Councillor refers to *sustainable economic growth*, and this has never been a satisfactory phrase, it's almost a contradiction in terms. It would be interesting to see whether sustainable economic growth is defined anywhere within any of the three documents.

The majority of the documents' contents do not go far enough in addressing the climate crisis.

## **Introduction**

Throughout the document there seem to be references to town centres: it would be appropriate to bracket with town centres village centres, since these are similarly important and contain a scale of development characteristic to all of the Scottish Borders. The proposed LDP surely contains as an integral element a strategic environmental assessment and it would seem fitting that this is referred to within the introduction.

Paragraph 1.11

It should be made clear to what extent the conclusions and recommendations of the reporter will actually be taken into account by the Council.

Paragraph 1.12

12 weeks including the Christmas and New Year holidays is too short a time to meaningfully evaluate such a mass of written material, probably around 1000 pages.

## **Section 2**

As a general comment, it is always useful to compare social and demographic figures with national ones.

Paragraph 2.5

While it is appreciated that the increase of 3.8% is a government projection, it would be useful to understand the evidence which leads to this conclusion.

Paragraph 2.6

As a generality it is surprising to see references to houses in the countryside, modest developments or not, without some kind of health warning.

Paragraph 2.8

As well as economic and societal recovery, mention should be made here of the importance of sustainability, and in particular to the importance of the environment and steps being taken to address the climate crisis.

paragraph 2.9

Ease of access to schools should also be included in the last sentence here.

Paragraph 2.10

It is unfortunate that no reference here has been made to the area partnerships.

#### Paragraph 2.11

Presumably this refers to the healthy weight of an individual.

#### Paragraph 2.13

It seems very difficult to believe that the needs of disabled people are currently unquantified. This seems most unlikely. There are several references to supplementary planning guidance in this plan but there was at one time a suggestion that such guidance be abandoned subsequent to the review of planning, and clarification of this point would be welcome.

#### Paragraph 2.14

A balance must be struck between maintenance of the road network and its upgrading: at present there is arguably insufficient funding for the repair and maintenance of existing roads and this must be addressed as a matter of urgency.

In addition to supporting the southward extension of the Borders railway, consideration should also be given to the reintroduction of a rail link from the Central Borders to the East Coast mainline through Berwick-upon-Tweed.

#### Paragraph 2.15

As part of consideration of Borders railway expansion, it is hoped that there will be community consultation of a meaningful kind.

#### Paragraph 2.16

Access to superfast broadband should be a right rather than something *nice but not necessary*. Clearly this is important to rural businesses, but the pandemic has meant that working from home and homeschooling have underlined the need for 100% coverage as soon as possible. This plan should indicate a specific time-bound objective within which this matter is to be addressed: there should be no weasel words such as *“as comprehensive as possible”*.

#### Paragraph 2.18

Rhetoric about ensuring high-quality design needs to be matched by clarity as to how this is to be delivered, and specifically it might be expected that planning authority officials should be suitably skilled in matters of design, and that the planning authority would introduce some form of design panel to ensure that significant developments genuinely are of high quality. These are features of success in other planning authorities in Scotland, though sadly not all.

### **Section 3**

#### *Policy background*

Given that the planning system is currently being revised it seems strange that the local development plan does not reflect more closely the changes being put forward at the national level. Similarly it seems odd that SESplan 2 and the Borders land-use strategy are not more prominently featured as part of the strategic framework within which the LDP must operate.

#### Paragraph 3.5

It is difficult to understand why there is no mention of climate change and sustainability in considerations of the SDP.

#### Paragraph 3.7

Despite the inadequacy of both strategic development plans, there is still a need for a regional overview which in particular takes account of the climate crisis and sustainability, both of which cannot be considered only within the boundaries of the Scottish Borders Council area

#### Paragraph 3.8

Cross boundary relationships are also relevant to the National boundary, and in particular to the position of Berwick-upon-Tweed, and green networks such as the Southern Upland Way and Pennine Way. Former railway lines should be retained pro tem as significant footpath and cycleway networks, but the long-term possibility of their revival as railways should also be borne in mind

#### Paragraph 3.9

It is unfortunate that the phrase *sustainable economic growth* is used in this paragraph, and doubly unfortunate inasmuch as it does not appear to include of itself the protection of the landscape and environment. This is a strategic error: what is sought is sustainable development which delivers successful economic, environmental, and social objectives *altogether*.

#### Paragraph 3.10

The community plan seems not as well-known as it should be. If there is such a document as described in this paragraph then presumably it is active between 2017 and 2027. Understanding of its existence and contents seems somewhat overstated, and this is a considerable concern in view of Scottish government's commitment to the close alignment of Community planning and development planning over the next few years.

#### Paragraph 3.11

The community plan, to be effective, cannot be a *live document* but must be time bound and capable of being monitored and reviewed: can it be made clear as to whether the Scottish Borders community plan is to be considered a material consideration in the development of the LDP?

#### Paragraph 3.12

It is not the experience of many folk in the Borders that the Scottish Borders community planning partnership works together with local communities. It would be a useful exercise if, as part of the LDP, elements of the community plan which might have relevance for the LDP were clearly articulated.

#### Paragraph 3.13

Area partnerships do not appear to be working well, and although they may have a role to play in addressing issues of community planning and local development planning, this has yet to be substantially delivered. Even the boundaries of the locality plans seem surprisingly arbitrary, and it has been suggested that a more logical set of *localities* might be determined with secondary schools as their hubs.

The status and the content of the area locality plans do not seem to be clearly addressed within the body of the local development plan, but if they do appear in this large document it would make sense for them to be referenced to page numbers in this paragraph.

#### paragraph 3.14

It is not clear what relationship there may be between the new corporate plan *our plan for 2018 to 2023 and your part in it*, and the local development plan. Nor is it clear whether this document was produced with meaningful public consultation.

### **Section 4: vision, aims and spatial strategy**

#### Paragraph 4.1

Given that the Government rejected SESPlan2 in part because of the failure to present a coherent transport strategy, the *vision* as presented would seem somewhat risky. At least it does not lay claim to sustainable economic growth as an aim, though as with the body of SESPlan2 outwith the SEA, it is particularly light on *environment*.

#### Paragraph 4.2

The provision of superfast broadband is even more important than road improvements, and should be mentioned here.

Is there in fact a business land shortage? Where is the survey information, or at least an updated version – and perhaps a reference to derelict land within the Council area?

#### Paragraph 4.3

The housing land supply identified in the LDP appears overgenerous, and thus perhaps does not focus adequately on the locations where development would be most appropriate: there may be an element of wastefulness in this. The suggestion that the new housing figures in the LDP reflect an appropriate level of demand appears given the lie by average completion numbers over the years.

#### paragraph 4 .4

Town and village centres should accommodate housing as a priority as well as following the *town centre first* principles.

#### Paragraph 4.5

Brexit is liable to create major challenges for *everybody* in rural areas, not just rural landowners. Rural schools, rural facilities including village halls, and high environmental quality should also be added to the priority list for rural areas.

#### Paragraph 4.6

While protection and enhancement of heritage are welcome, and should be priorities, it is also important to know in an up-to-date fashion what it is that is important in the way of heritage assets.

The tone of this paragraph requires some attention. Rather than *capitalising* on heritage assets, the need for them to be conserved and handed on to subsequent generations must be emphasised. In many cases conservation management plans will be required to *ensure* that this is done in a sustainable and balanced manner.

#### Paragraph 4.7

Again the tone of this paragraph is a little self congratulatory and does not chime well with the relatively recent though welcome establishment of the sustainable development committee which is still to make its mark.

Reference might be made to the Sustainable Development Goals, and the fact that the Council has at least declared the climate crisis.

As well as being clear about its role as a regulatory authority in addressing the climate crisis, as an organisation the Council should at the very least have an understanding of its own carbon footprint and a clear plan which will take it to decarbonise in accordance with Scottish government targets.

#### Paragraph 4.8

Presumably there will be a requirement for special-needs housing although it seems at present the Council does not know the extent of this requirement. Finding this out should be a priority.

Nothing in the LDP documentation thus far has indicated that new communities, sustainable or otherwise, attractive and distinctive or otherwise, are required. Instead there ought to be emphasis on conservation of existing communities, and of the built and natural environment.

It is not clear what is meant by an *adequate* range of sites and premises for business/industrial units and uses.

Economic development along the railway corridor will only make sense if it is planned at the most appropriate nodes in the way of stations or halts: it will be important to discuss this when the assessment of line proposals comes forward.

As stated above the regeneration of villages as well as towns will be important, along with positive conservation and, where possible, the take-up of any built slack by the promotion of residential use. This will contribute to sustainability.

In a circumstance where funds for new public infrastructure are limited, it will be important to focus them on a relatively limited range of locations rather than taking a scattergun approach to the provision of sites with development consents.

There is more to sustainability than the protection and enhancement of the built and the natural environments: again it might be relevant to list out the Sustainable Development Goals.

Waste management on its own is not enough: the mantra must be reduce, reuse, recycle.

There will be a requirement for climate change adaptation and mitigation, and the sooner the better.

It seems that the protection of Green spaces within built-up areas maybe another casualty when planning convenience trumps sustainable planning for everyone.

The candidate National Park proposal which recognises that high landscape values sometimes cross national boundaries, should be mentioned here.

#### Paragraph 4.9

To avoid further confusion it may be helpful to identify which SDP, SDP1 or SDP2 is referred to here. At a time when retail and commercial uses appear to be shrinking, at least in terms of floor space requirements, residential conversion and the promotion of mixed use town and village centres should be encouraged.

The existence of Berwick-upon-Tweed as a place of considerable significance to the eastern Borders should be acknowledged. After all it is only just in England.

#### Paragraph 4.11

While dualling of the A1 may be beneficial in road safety terms, it seems unlikely to be something which will contribute to economic growth in any serious manner. Similarly it is difficult to imagine the impact of large-scale offshore renewables on the picturesque fishing town that is Eyemouth.

#### Paragraph 4.12

Relatively poor links to Edinburgh suggest that despite housing pressures for it to become a dormitory town, Peebles should be carefully regulated in order to retain its present qualities of sustainability as a county town. Perhaps there is an argument that Peebles too should once more have a link to the Scottish railway network.

#### Paragraphs 5.1 to 5.3

Surprisingly there is nothing here relating to the climate crisis, which even as far back as the Stern report was shown to have considerable economic investment opportunities.

#### Figure 4

Perhaps this figure would benefit from having information on it relating to numbers of the economically active, both in the Scottish Borders and in Scotland.

#### Paragraph 5.4

It could be concluded from this paragraph that there is overmuch land allocated for business and industrial use. In discussions relative to the Borders railway expansion it will be important to analyse its potential significance in sustainable development terms, not just those which relate to business or industrial aspects.

#### Paragraph 5.5

Sites identified for business and industrial uses should not be readily used for other purposes unless and until the next local development plan so identifies them.

#### Paragraph 5.6

No information is shared about the possibility of derelict or contaminated land available in the vicinity.

Working from home may also be a possibility in Peebles. The influence of Edinburgh is perhaps felt more strongly here but unless public transport can be improved the expansion of the town might be better resisted.

#### Paragraph 5.7

As stated above, the opportunities presented by the railway corridor, both existing and proposed, should reflect the potential for sustainable development, not just for business and industry. It is hoped that the Borders railway expansion feasibility study will involve community consultation so that the full potential of the railway can be delivered.

It is hoped that *Town centre first* principles will apply in any analysis of Galashiels, and although the great tapestry of Scotland may be more than a catalyst, it would seem that sustainable development must involve significant use of town and village centre sites in residential use.

#### Paragraph 5.8

The proposed National Park incorporating the northern Cheviots is a project which would benefit the centre of Jedburgh, particularly if a National Park Centre was located there.

#### Paragraph 5.9

Simplified planning zones are a broadly unsuccessful planning tool, and despite its initial promotion as part of the recent planning review this is not the term which is being promoted by the revised planning system.

The Tweedbank masterplan has been particularly successful in structural landscaping terms, and any proposals must recognise and reinforce the special landscape qualities created by those who came before us.

#### Paragraph 5.10

While city region deals should not be ignored, to some extent they can cut the legs from under the statutory development planning system, and it is important that any additional funding which they may provide is used to achieve the ends identified and publicly accepted in the development plan as approved.

The south of Scotland enterprise agency should not be considered to focus solely upon economic activities. That is not its remit. Its creation should be seen as an opportunity to promote sustainable development linking economic, environmental, and social benefits. It will be important for the local development plan to identify opportunities where this enterprise agency can act for the wider public good, and in particular be energetic in addressing the challenges of the climate crisis.

#### Paragraph 5.11

The local development plan should give more weight to sustainable development, not solely to the economic development benefits which can be accrued by sound planning.

#### Paragraph 5.12

While there are many potential benefits in reestablishing rail connections from the Borders to Carlisle, increased access to Carlisle airport will not be one of them if it enables increased domestic flights, a serious and unnecessary contributor to greenhouse gas emissions.

## Planning for housing

### Paragraphs 6.1~ 6.3

It is disappointing that there is no reference here to the housing stock, both new and existing, in relation to addressing the climate crisis.

There requires to be some additional explanation of the total target figures given in table 3, since by simple calculation 18 years at 300 houses per year produces a total of just 5400.

### Paragraph 6.6

In line 3 it's maybe the poor *availability* of housing for younger people that is intended.

Nowhere is mentioned the density assumption for residential development on new sites. If this is left up to developers, they will generally be building what they think they can sell at the highest profit, rather than what would be useful for the community and a genuine contribution towards sustainable development.

### Paragraph 6.7

A hyperlink to the consultants' study should be provided. Here again it will be useful to understand whether the climate crisis in particular and sustainable development aims in general influenced their findings.

### Paragraph 6.8 and paragraph 6.9

The jargon used in these paragraphs is unintelligible to ordinary folk.

### Paragraph 6.10

On the evidence of current housing demand and construction rates, there can be no arguments for new standalone settlements being contemplated in the Scottish Borders. It is wholly inappropriate for the Council to be promoting fishing expeditions by developers and/or landowners towards such an end.

### Paragraph 7.1~7.3

As previously, sustainability demands that matters be considered in the round, including economic, environmental, and social factors.

Many of the principles of sound town centre management relate also to villages, and in particular *Town centre first* should apply. There is clearly some way to go in ensuring that this thinking extends across all Council departments, judging by the current failure in Jedburgh to consider the wider impacts of the intergenerational educational facility recently constructed. In sustainability terms, town and village centre living should be encouraged, and it is suggested that some initial survey work be carried out to promote this.

### Figure 5

An indication of Scottish vacancy rates would be helpful here.

### Figure 6

Here again some Scottish figures would be helpful.

The role of town centres may also be changing due to planning decisions taken on the introduction or relocation of supermarket developments. This graph in particular is almost unintelligible due to its use of colour gradation..

### Paragraph 7.4

The thrust of this paragraph is completely incorrect. Economic changes within Town centres cannot be met by economic stimuli alone, but need to reflect a more realistic process in which *to a greater*

*degree they become places where people want to live.* This is consistent with the *town centre first* philosophy.

Paragraph 7.5

There may be a case for the promotion of housing improvement and housing conversion grants.

Paragraph 7.7

To the lay reader, this paragraph will be gobbledygook.

Paragraphs 8.1 and 8.2

Consideration should be given to putting this at the beginning of the local development plan, since such matters should be at the forefront of any planning for our futures.

It is not clear from this section just what the Council is actually doing in this regard, both as planning authority and as far as its own business activities are concerned.

There should be a reference to the Sustainable Development Goals, and the Council's current performance towards achieving them.

Paragraph 8.3

It is possible that there may be helpful references within National planning framework 4 which are relevant. It may be difficult taking guidance from SESplan given that Scottish ministers rejected the latest version because of its inadequate transport strategy.

This paragraph has an important omission which should be corrected. Developments should be designed so that their **location**, use and layout help reduce the need to travel by car.

No doubt there will be public consultation on the draft Borders transport study 2018 in due course, but, independent of that, communities will wish to be consulted on the location, installation and use of electric vehicle charging points.

Paragraph 8.4

The UN Sustainable Development Goals should be enumerated. Pledges may butter no parsnips, and it will be better here to indicate what the Council is actually doing or has actually done. One imagines that establishing its own carbon footprint would be a start.

Paragraph 8.5

More gobbledygook.

Paragraph 8.6

It might be reasonable to ask whether there has been any assessment of the effectiveness of these strategies.

Some figures on homelessness and the extent of fuel poverty in the Borders might also be helpful.

Paragraph 8.8

It would be useful to know the contributions made by various energy sources in the Borders, and contrast these with the sectoral consumers of energy. That might be an initial point of reference as we strive towards reducing, reusing, and recycling.

Paragraph 8.9

It is not clear how a waste transfer station is going to improve Scottish Borders' transition towards a Zero waste target: some further explanation is required here.

Paragraph 8.12

In general, natural flood protection works and plans should be supported. The reintroduction of the Beaver should be promoted. Even a 75 year level of protection does not on the face of it seem sufficient.

Paragraph 8.13

Which land-use strategy is being referred to here? Is it the Borders pilot? how's that land-use strategy been publicly adopted as a basis of planning?. Is it a material consideration?

Paragraph 8.14

The melding of land-use strategy and development planning will require particular management planning on the ground, not just big picture stuff. This may be one of the greatest challenges facing the issues of sustainability and the climate crisis.

Paragraph 8.15

The feasibility study produced by the Scottish campaign for national parks identified the potential for at least seven additional national parks in Scotland. A National Park in the northern Cheviots would arguably have a logical centre in Jedburgh, and this could go some way to repair recent damage to the economy of the town centre.

## **Sustainability**

Paragraph 1.4

The preservation of agricultural land requires a specific reference here.

It might be useful if the Council could offer its own sustainability checklist. Other models are available

## **Quality standards**

Paragraph 1.1

There is much reference to new development, but a majority of concern should really be addressed to existing places and their appropriate conservation and sensitive adaptation to address the challenges posed by the climate crisis.

Paragraph 1.3

*Beauty* should be added to the list of qualities of successful places. It should be noted that this point was accepted by SESplan2 inquiry reporters.

Paragraph 1.5

It is surprising to see reference to building standards in the local development plan.

Here again there is reference to new development, but one of the major challenges will be adapting existing building stock and life patterns to address the challenges of climate change.

Paragraph 1.7

It is all very well setting up a sustainable development committee, but beyond potential what current relevance has it got to the planning of the Scottish Borders and in particular to local plan policies and proposals?

*Policy PMD 2: quality standards*

## **Sustainability**

A) in terms of **location**, layout, orientation, construction, and energy supply...

The section on accessibility should mention the importance of easy walking distances to community facilities including public transport.

Place making and design matters would benefit from consideration of the following:

- An Urban Design Panel
- The promotion of pre-application discussion without the imposition of additional fees
- The recruitment of suitably skilled designers in regulatory positions
- A requirement for high-quality place making in all public developments, especially by the Council itself as demonstrating strong leadership in this area.

## **Land-use allocations**

### *Policy PMD3*

Surely this should have some reference to the land use strategy?

There should be an assumption that agricultural land will be retained.

#### Paragraph 1.4

While it is possible that the Council may not have the relevant skills in-house at the moment, instinctively the employment of consultants to produce developers' briefs on the instruction of developers seems inherently suspect without additional safeguards.

Development briefs should also be examined and reported upon by the Council's urban design panel.

### *Policy ED 10*

#### *Protection of prime quality agricultural land and carbon-rich soils*

The title of this policy is unhelpful. As paragraph 1.1 demonstrates, land of lesser quality that is locally important should not be taken for development in normal circumstances. Within the Borders provision must be made to take account of such land of lesser quality, especially land closely associated with towns or villages. Some additional explanation is required to help people understand the meaning of the last sentence of paragraph 1.1.

#### Paragraph 1.2

Again there should not be a reference only to prime quality agricultural land.

#### Paragraph 1.3

it is not clear what is meant by *areas of deepest peat*. Reference should be made in this paragraph to the land-use strategy and the importance of integrating land-use and statutory planning processes.

Figure ED10 A ought to identify non-prime agricultural land of local significance.

### *Policy ED 12*

#### *Mineral and coal extraction*

There must be a presumption against coal extraction in any part of the Scottish Borders as we move to decarbonise and address properly the climate crisis.

#### *Housing development policies*

It would seem helpful if there were paragraphs on the following

- Homelessness
- Fuel poverty
- Sub-tolerable housing
- The extent to which holiday homes are distorting the housing market.

### *Policy HD2*

### *Housing in the countryside*

There should be a clear call to prevent the sterilisation of agricultural land.

### *Policy HD6*

#### *Housing for particular needs*

As a policy this seems far too vague.

## **Environmental promotion and protection**

### Paragraph A

Comments like ensuring the right development occurs in the right place (at the right time) are just additional wishful thinking waffle which should have no place in a modern planning document.

### Paragraph B

Designations on their own are not enough: conservation management plans of one kind or another are essential to provide a framework to achieve the objectives of designation.

### Paragraph C

Battlefield should be added to this list. There should be a regular review of the list of listed buildings. This should be done as a minimum on the same cycle as local plan preparation. This paragraph should also refer to the need for conservation area management plans, scheduled monuments, and archaeological sites.

Any *candidate* designations such as the proposed National Park should also be mentioned.

### *Policy EP1*

#### *International nature conservation sites and protected species*

Some reference should be made to the impacts or not of Brexit upon international designations.

### *Policy EP4*

#### *National Scenic Areas*

Designation of itself is of little practical value to the special landscape qualities of the national scenic areas. What is required is a conservation management plan for each of them. Without such a management plan they will be vulnerable, especially given the weasel words of the policy in paragraph B.

### *Policy EP6*

#### *Countryside around towns*

### Paragraph 1.2

Consideration should be given to the production of management plans for the areas of countryside around towns. It is too easy for these to fall prey to deliberate or accidental dereliction especially when the possibility of long-term development value is in the air.

Countryside around both towns and villages is important to residents, and it is simply not credible that it should be restricted to the central Borders as shown in figure EP6A.

### *Policy EP7*

#### *Listed buildings*

Somewhere in this policy should be noted the need to promote regular review of lists of historic buildings, ideally on the same cycle as local development plan preparation, in order that development planners have the best information for effective conservation planning.

#### *Policy EP8*

##### *Historic environment assets and scheduled monuments*

There is some lack of clarity in this title since listed buildings already mentioned are historic environment assets, so some tidying up of this would be helpful. It has become fashionable for archaeologists to refer to historic environment matters as their own, so perhaps the title here might be better to read *archaeological* assets and scheduled monuments.

Figure EP8A is particularly useless. At the very least, labels should be attached to the battlefield sites.

#### Paragraph 1.5

It would be helpful to mention the date when conservation areas were reviewed, and indeed to identify the location of the additional three conservation areas. It would be helpful to explain which is the *technical background note* addressing boundaries of conservation areas. Conservation area statements are all very well but the reality is that only conservation area conservation management plans will give public confidence in successful conservation of the special qualities into the future. It is suggested that a programme of such conservation area conservation management plans should be actioned as soon as possible.

#### Paragraph 1.6

It seems unfortunate that there has been a lowering of standards of conservation in Newcastleton.

#### *Policy EP 10*

##### *Gardens and designed landscapes*

As with conservation areas, there is an urgent need to produce conservation management plans for all Inventory sites especially prior to any development which may affect their character. It is hoped that the non-Inventory sites have also been assessed against the range of criteria provided by those establishing the Inventory.

#### *Policy EP 11*

##### *Protection of green space*

Policies on protection of green space should stress the importance of seeking sustainable development, in other words retaining green space wherever possible and encouraging any new development to enhance its special qualities: it may be that management plans are necessary for significant and complex green spaces with multiple functions.

#### *Figure EP 12A*

Green networks should also be expanded to take into account the Southern Upland Way and the Pennine Way.

#### *Policy EP 14*

##### *Coastline*

It is surprising that the impacts of climate change are not discussed in this paragraph

Any landfalls from marine windfarms ought to be discussed here

There may be visual impacts of marine windfarms which should also be taken into account.

#### *Policy IS 7*

##### *Parking provision and standards*

Electrical charge points require to be located in positions closely associated with parking, so this must be taken into account in the preparation of a location plan for public electrical charge points. The UK government has already announced a date beyond which only electric new vehicles can be sold.

Additional public parking is unlikely to be a sustainable answer to problems of parking difficulties in town centres, so it is suggested that some modification of policy IS 7 is essential.

#### *Policy IS 13*

##### *Contaminated and unstable land*

Maps and tables indicating the extent and location of contaminated, unstable, and derelict land should be provided in order that the extent of the problems can be understood, and appropriate policies set in place which identify objectives to be achieved by the end of the plan period, seeking say diminution of such problem areas by 50%.

#### *Policy IS 14*

##### *Crematorium provision*

This policy ought to be underpinned by some understanding of pressures on existing crematoria. Unless requirements cannot be satisfied by existing crematoria or met in other ways there seems little point in promoting the idea of further provision.

#### *Policy IS 16*

##### *Advertisements*

At one time there was an area of special advertising control in St Boswells, and it would be useful to know if this is still current or has been superseded by changes in planning legislation.

#### *Policy IS 17*

##### *Education safeguarding*

This principle should also be applied to rural primary schools, and in particular, given their strategic importance to maintaining rural communities, it is suggested that a policy be introduced whereby school closures can only happen after agreement through the local development plan mechanism, rather than in response to relatively short-term financial considerations.

#### *Appendix 3*

##### *Planning guidance and standards*

##### *Criteria for prioritising supplementary planning guidance*

There is a case for re-visiting as a matter of urgency all supplementary planning guidance in the context of the climate crisis. However, in the case of any new supplementary planning guidance, the climate emergency should be added at the top of the list of criteria.

