

Johnston, Charles

From: Mark Rowley [REDACTED]
Sent: 03 March 2014 15:32
To: localplan
Subject: Representation from Cranshaws, Ellemford & Longformacus
Community Council to the Scottish Borders Local Development Plan
Attachments: Cranshaws, Ellemford & Longformacus Community Council response
to Local Development Plan.docx

Please find the CC representation attached

An additional one relating to settlements follows

With best wishes

Mark Rowley
Chairman
Cranshaws, Ellemford and Longformacus Community Council



CRANSHAWS, ELLEMFORD & LONGFORMACUS COMMUNITY COUNCIL

Representation response from Cranshaws, Ellemford & Longformacus Community Council to the Scottish Borders Proposed Local Development Plan.
March 2014.

VISION, AIMS AND SPATIAL STRATEGY.

3.5. Digital Connectivity.

We wholeheartedly support the need to create adequate digital connectivity in more remote rural areas such as ours. Additional transport links are unlikely to materialise for smaller settlements, so far better digital connections are vital as services will increasingly need to be accessed this way. Current broadband provision is inadequate and sometimes non-existent for some homes in our area.

3.6 Provision of Housing Land.

We consider small amounts of additional housing will be required to bolster declining populations in smaller settlements such as ours. We acknowledge the need to base most additional housing in larger clusters, but feel smaller settlements should be assessed for small amounts of potential development.

Even very small numbers of additional homes could improve the viability of local community life and help slow the trend to some becoming commuter dormitories or holiday home clusters. We make a separate response on this.

3.7. The Borders Environment

This Community Council wholeheartedly endorses the aim to protect our built and natural heritage. We fully recognise that it is central to our ability to encourage people to live, work, invest or visit here.

We recognise though that despite AGLV & SLA landscape designations much of this community's natural heritage and open space has been sacrificed already in support of national energy policy. We urge a robust approach to protecting the Borders' environment especially in locations close to where existing damage has been done.

POLICY ED9 RENEWABLE ENERGY DEVELOPMENT.

Our community's residents have had more experience of renewable energy development than most. The impacts of large-scale wind farm development are now a virtually inescapable feature of daily life in the area. Additional development pressure appears to be relentless.

As a community we are supportive of renewables, especially solar, biomass and hydro and have been supportive of appropriately-sited and scaled wind developments. There is a general acceptance that enough is enough and there is little capacity in our area for further wind development.

This Community Council is generally supportive of ED9 and welcomes its general clarity.

We note the following;

1.1. Should recognise that much (if not most) of the interest in renewable energy is driven by the financial incentives available, rather than some green altruism.

From a developer perspective the subsidies, such as FITs and ROCs, have been the main driver and they continue to be so.

Locally smaller schemes are likely to be driven by the imperative to reduce high energy costs, particularly high in this area due to climate exposure, predominantly old housing stock and our off-grid situation.

1.4. This Community Council is strongly supportive of measures to encourage local use of renewables such as local biomass and district heating systems. This ought to be a priority in off-grid areas that have large timber resources close to hand.

1.5. It is the clear view of our communities that we have already helped make a more than adequate contribution to national renewable energy targets and that the landscape and visual impacts on the Lammermuirs are now far beyond acceptable.

1.6. We welcome the suite of 3 Council productions: Wind Energy SPG, Landscape Capacity and Cumulative Impact Study and the "Berwickshire Guidance".

However all three have a significant weakness in that *each defines turbine scale differently*. This is potentially misleading and unhelpful, especially when assessing a proposal using 2 or more of the documents (as is almost inevitable). It will also be unhelpful when assessing consultee responses and developer Environmental Statements – it effectively forces the comparison of "apples with oranges". This will be unhelpful to developers, planners or objectors and will confuse any observer.

Before they are committed to policy in the LDP they should be revised so that *both the terminology of scale* (is a turbine small or large?) *and the parameters of each size* are consistent across each piece of guidance.

Currently they are extremely confusing;

Local Development Plan ED9 based on the Ironside Farrar Report;

- Medium 25 – 50m
- Large 50 – 100m

- Very Large 100m +
- (a presumed “small” designation of less than 25m is noted, but not assessed in this report)

Wind Energy SPG

- Small less than 20m
- Medium 20 – 60m
- Large over 60m

Berwickshire Guidance

- Small 20-35m
- Small/medium 35-50m
- Medium 50-80m
- Large 80m +

Other factors relating to scale or size should be recognised.

i. Applications for ever-larger turbines are appearing with applications for 150m + ones and consents for 145m ones (at Aikengall II). These are clearly far different from the “large scale” turbines in the Wind SPG of 60m, the Berwickshire Guidance “large” typology of 80m or even the ED9 largest proposal of 100m +.

ii. Height is not the only factor in scale. Whilst the height is handy shorthand when describing turbines, the blade length and swept area should be given more consideration as these are becoming significantly larger.

iii. As ever larger proposals come forward there appears to be a downward revision of what constitutes a large turbine. It is not that existing large turbines are becoming smaller; they are just relatively smaller than later larger-scale ones. Any observer would consider Black Hill’s 78m turbines “large”, though those at Fallago Rig of 125m, or Aikengall II at 145m, are clearly significantly larger.

It appears that Ironside Farrer’s identification of four typologies best reflects the typologies currently at application or already consented. It also best-matches public perceptions –e.g. that turbines larger than 25m would rarely be described as small, whilst those of 50m+ would be seen as large structures.

- We suggest that at least four bands are required to describe wind turbines.
- Once the impacts of 145m or larger turbines and turbines with larger blades and swept areas can be seen an “Extra Large” category may become helpful or necessary.
- The forthcoming revision of the Wind Energy SPG should allow an opportunity to bring consistency to the description of typologies.

We have concerns at the tensions between areas identified as ones where cumulative impact limits development also being identified as areas with highest capacity? This is particularly relevant to this Community Council Area and the Lammermuir Hills SLA.

Inconsistencies in Figs ED9a – e remain. Eg ED9b suggest large areas of the Lammermuir Hills SLA has highest capacity whilst also recognising that those areas are where cumulative impact limits development.

ED9e showing a medium capacity for very large turbines in the same area just adds to this tension.

We would like to see areas identified where capacity had been reached or almost reached. It is clear that significant areas of the Lammermuirs are now at, or beyond, their capacity to accept additional development in landscape, visual and often cumulative terms. This should be recognised.

POLICY ED10 PROTECTION OF PRIME QUALITY AGRICULTURAL LAND AND CARBON-RICH SOILS

We welcome additional protection for carbon rich soils and agricultural land. We would particularly like to see more robust assessment of these issues relating to the substantial tracks and infrastructure involved in windfarms and other large-scale development.

(We suspect the colour coded key to Fig ED10 has the two transposed?)

POLICY E5 SPECIAL LANDSCAPE AREAS

We welcome this restatement of a commitment to afford protection to SLAs, particularly with reference to the Lammermuir Hills SLA.

We should record that significant development has already had an impact on some SLAs. Further proposals should not be allowed to take support for their proposals from existing detrimental impacts on SLAs, but should be tested against tests for both "maintenance" and "enhancement" of the SLA's qualities.

It would be helpful to emphasise that EP5 relates not just to development within an SLA, but also to development out with its boundary that impacts upon the SLA.

POLICY EP13 TREES, WOODLANDS AND HEDGES

This Community Council is supportive of protection for trees, woodland and hedgerows. We would like to see policy aspire towards increasing or enhancing these assets, not just "maintaining".

Work to identify appropriate local tree, woodland or hedgerow assets particularly worthy of protection might be considered useful.

POLICY IS5 PROTECTION OF ACCESS ROUTES

This CC supports policy that maintains and enhances rural access. We would like to see a more proactive stance to ensure existing access routes are free from obstruction.