

Planning Policy & Access Team
Scottish Borders Council

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Via email to: localplan@scotborders.gov.uk

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Dear Sir/Madam,

SCOTTISH BORDERS COUNCIL LOCAL DEVELOPMENT PLAN 2: RESPONSE TO MAIN ISSUES REPORT ON BEHALF OF NEART NA GAOITHE OFFSHORE WIND LTD

We act on behalf of Neart na Gaoithe Offshore Wind Ltd (NnGOWL) and are pleased to engage in the preparation of Scottish Borders Council's (SBC's) Local Development Plan (LDP) 2 on NnGOWL's behalf.

NnGOWL is a wholly owned subsidiary of EDF Renewables and is developing the Neart na Gaoithe (NnG) Offshore Wind Farm, an offshore wind farm of up to 450MW located approximately 15.5km of the Fife coast.

Terrestrial elements of the NnG development include a new substation, underground cable route and associated construction works, all of which are located within the administrative boundary of East Lothian Council (ELC). NnGOWL's new substation, as well as associated infrastructure being delivered by statutory undertakers, are located very close to the boundary between ELC and SBC and fall within the definition of National Planning Framework (NPF) 3's national development number 4. As such development within the SBC area has potential to affect upon infrastructure associated with the NnG development.

Further, NnGOWL recognises the strategic importance of the Scottish Borders coastline and has identified Eyemouth Harbour as a location with potential to provide operation and maintenance support services to NnG.

NnGOWL's submissions in respect of the ongoing LDP2 Main Issues Report (MIR) are detailed below, and cover the overarching aims as well as distinct planning policy areas, namely:

- Context, vision, aims and spatial strategy – considered in part 1 of this submission, in response to MIR question 1;
- Emerging LDP2 policy relating to potential economic development opportunities associated with the strategically significant context of the Scottish Borders coastline, specifically the potential for Eyemouth Harbour to play a significant role supporting the emerging offshore renewables, particularly in relation to an operation and maintenance support role – considered in part 2 of this submission in response to MIR questions 1 and 2; and
- Emerging LDP2 policy relating to national development number 4 (an enhanced high voltage energy transmission network), as defined by NPF3 – considered in part 3 of this submission, in response to MIR question 19.

Part 1: Context, Vision, Aims and Spatial Strategy

The MIR/emerging LDP2 are considered in the context of "Infrastructure, Transport and Sustainability" in paragraphs 2.6-2.15. This summary omits reference to two industries of strategic significance to the Scottish Borders given its location: (i) the emerging offshore renewables industry; and (ii) coastal industry, ports and harbours.

These omissions are reflected in SBC's consideration of the aims of the MIR/emerging LDP2, specifically:

- In paragraph 3.2 "Growing our economy", there is no reference to the potential for economic development opportunities associated with the emerging offshore renewables industry;
- In paragraphs 3.2 and 3.5, "Growing our economy" and "Rural environment", respectively, there is no reference to significance of the Scottish Borders coastal economy. Indeed, reference to the rural environment/rural economy

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can be found throughout the MIR, while reference to the coastal economy are absent, as is any reference to Eyemouth Harbour as a location of local and regional significance to a range of industries, potentially including the offshore renewables sector.

Such omissions are reflected in the absence of associated references within the summary of main aims provided at paragraph 3.8.

As such, in response to *Question 1 (Do you agree with the main aims of the LDP2? Do you have any alternative or additional aims?)*, NnGOWL would respond as follows:

NnGOWL does not disagree with the Vision as stated within the MIR, nor to the inclusion of any specific aim. It does however consider there to be significant omissions and suggests the following inclusions:

- i. A new sentence should be inserted within existing paragraph 3.2, under the existing heading “Growing our economy”, as follows: “Further, the LDP2 should facilitate development associated with the growing offshore renewables industry, in particular that which is dependent upon the strategic significance of the Scottish Borders’ ports and harbours, and which contributes positively towards the economic development of such coastal locations.”
- ii. Amend the “Rural environment” heading to “Rural and coastal environment” and include within paragraph 3.5 the following sentence: “Reflecting the strategic significance of the Scottish Borders coastal towns, the LDP will support appropriate development in coastal locations which promotes economic development opportunities whilst continuing to safeguard the coastal environmental”; and
- iii. At paragraph 3.8, under the “Growing economy” heading, include:
 - “Promote economic development opportunities at ports, harbours and other coastal locations, including those related to the offshore renewables industry.”
- iv. In the spatial strategy as it relates to the Berwickshire RGA, amend the penultimate sentence to instead read: “It continues to function as a working fishing port with an important tourism role, with potential for growth and diversification linked to the offshore renewables industry, as well as other complementary industries.”

Part 2: Offshore renewables-related economic development opportunities in coastal locations, including Eyemouth Harbour

The omissions referenced within Part 1 of this submission are reflected in MIR Section 4: Growing our economy. In general terms Section 4 fails to address the needs of emerging industries and the associated economic growth and development opportunities, for example the opportunities for coastal locations such as Eyemouth, associated with the emerging offshore renewables industry.

Linked to the suggested inclusion of an additional bullet point at paragraph 3.8 (see inclusion iii, in part 1 of this submission), (and therefore in part-response to *Question 1 (Do you agree with the main aims of the LDP2? Do you have any alternative or additional aims?)*) NnGOWL recommends the inclusion of a new paragraph within the Main Issues sub-section (paragraph 4.12-4.15), covering the promotion of economic development opportunities at ports, harbours and other coastal locations. In relation to the offshore renewables-related opportunities at Eyemouth Harbour, that paragraph should include the following sentence: “...Land at and surrounding Eyemouth Harbour should be promoted for a mix of employment generating uses, including complementary ancillary uses such as the approved helicopter access facility, which promote the potential role of Eyemouth Harbour in supporting the offshore renewables industry...”.

In response to *Question 2 (Do you agree with the preferred option to retain the existing ‘Strategic High Amenity’ site categorisation and amalgamate the remaining categories? Do you agree with any of the alternative options including to retain the current policy position? Or do you have another alternative option?)*, whilst reserving a position in respect of the identification of a preferred option, NnGOWL support the need for flexibility within allocations relating to strategically important economic development areas (such as the Gunsreen allocation near Eyemouth Harbour), particularly in relation to some forms of sui generis uses and/or uses complementary to wider Class 4/5/6 development.

By contrast, the adoption of a sequential approach would not necessarily encourage complementary uses and could result in overly restrictive allocations which do not meet industry requirements. For example, the recently approved helicopter access facility significantly complements Eyemouth Harbour's wider offering as a potential O&M base for the NnG development. It is unclear how such a new policy approach (i.e. including the sequential element) could facilitate such a sui generis use without an element of flexibility afforded by the existing policy designation and associated development brief.

Part 3: NPF3's National Development 4

The national planning policy background outlined at paragraph 2.16 and 2.17 makes reference to NPF3, but does not reference the associated national development designations of relevance to the Scottish Borders. Such national development designations include NPF3's national development number 4, which relates to an enhanced high voltage energy transmission network ("national development no.4").

Emerging LDP policy pursuant to national development no.4 has been considered by Scottish Government Reporters in the Examination into the East Lothian Local Development Plan. In 2018, Reporters recommended the inclusion of the following policy, which has subsequently been incorporated within the now adopted East Lothian LDP:

"Policy EGT4: Enhanced High Voltage Electricity Transmission Network

The council supports enhancement of the high voltage electricity transmission network in locations defined by operational requirements, subject to acceptable impacts on the landscape, visual amenity, communities, natural and cultural heritage and the provision of appropriate mitigation where required.

The network infrastructure is identified on Strategy Diagram 3 elements of which, including strategic reinforcement points, will likely be subject of some upgrading during the lifetime of this plan. Development consisting of new and/or upgraded transmission lines, substations and transformer stations to enhance the network is designated as a national development in National Planning Framework 3. The council will not support development proposals which could prejudice the implementation of the enhancements.

The council will expect the removal of power lines which become redundant as a consequence of enhancements to the network."

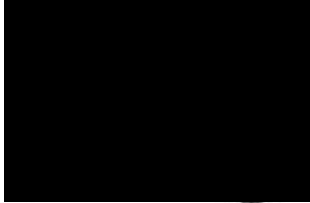
National development no.4 applies equally to the Scottish Borders Council area as it does to East Lothian. The rationale and justification for the inclusion of LDP policy relating to national development no.4 are the same in the Scottish Borders as those considered by the Reporters in respect of East Lothian.

As such, in response to *Question 19 (Are there any other main issues which you feel should be addressed within LDP2? Please confirm these and explain how these could be addressed)*, for the reasons outlined above, by the Scottish Government Reporters in their Report of the Examination on the East Lothian LDP, and in order to deliver the nationally significant policy objectives of NPF3's national development no.4, NnGOWL recommends the inclusion of a similarly worded policy within the forthcoming LDP2, specifically which:

- Promotes development pursuant to national development no.4; and
- Resists development proposals which would jeopardise enhancements pursuant to national development no.4.

We trust the above mentioned representations will be taken into account in the preparation of the Proposed LDP2. We would be happy to discuss any elements of these representations or to provide any further details which might assist that process; please do not hesitate to contact Rosie Scurr on 07967445717

Yours faithfully



Grant Young
Director, Young Planning & Energy Consenting Ltd
On behalf of: Neart na Gaoithe Wind Limited

cc Rosie Scurr NnGOWL