

Response ID ANON-7TG7-FA2B-4

Submitted to **LDP2 - Main Issues Report**

Submitted on **2019-01-22 19:07:57**

Data protection

About you

Are you responding as an: individual, organisation, or an agent acting on behalf of a client?

██████████

Individual

What is your name?

Individual name:

████████████████████

What is your address?

Address line 1:

████████████████████

Address line 2 :

by ██████████

Address line 3:

Town/City:

██████████

Post code:

██████████

What is your contact number?

Individual Phone No:

████████████████████

What is your email address?

Individual email:

██

Vision aims and spatial strategy

Question 1

Q1 Agree aims LDP2:

As far as the Built and Natural Heritage aim is concerned I would suggest that this is not so much an aim, more a continuation of business as usual. An aim, in anyone's language, must seek to take us from where we are now to some better place, or a better position. To be part of a development plan this aim should therefore seek to develop, ie advance, the protection and enhancement of our rich built and natural heritage. There is one certain way in which to do this which has not yet been tried for the Scottish Borders. Designation of part of the local authority area as a National Park would achieve this and provide much-needed sustainable economic development on a scale beyond the reach of any of the other initiatives on the table at present (with the exception of the extension of the Borders railway to Carlisle which instead would complement a Borders National Park, as well as vice versa), very worthwhile as those other initiatives are. While National Park designation is not in the gift of the Council, it is something which the Council can promote and support, at no additional cost to its own budget.

On Sustainability and Climate Change, I would point out that Scottish Borders Council has a duty to reflect UK Government policy in its development plan, where it refers to reserved matters. Energy is a matter reserved to the UK Government. In the House of Commons recently our MP John Lamont noted concerns over the number of large wind farms in the Scottish Borders, before seeking an assurance that 'industrial' onshore wind would not be promoted by the UK Government over other forms of renewable energy which have less impact on local communities.

During Questions to the Secretary of State for Business, Energy and Industrial Strategy, Mr Lamont said: "I very much support renewable energy but many of my constituents in the Scottish Borders feel we have our fair share of onshore wind."

"So can the Minister assure me that nothing in Government policy will promote onshore wind farm development over other forms of renewable energy?"

In response, Minister for Clean Energy, Claire Perry MP responded: "That is exactly the point of technology neutrality," referring to the UK Government policy that

as many forms of renewable energy as possible should be allowed to bid for Government support to avoid supporting one type of energy over another.

It is suggested that the Sustainability and Climate Change aim should make reference to the UK Government's policy of technology neutrality, in terms which show that SBC is not favouring one type of energy over another.

Growing our economy

Question 2

Q2:

Q2 upload:

No file was uploaded

Question 3

Settlement business allocated:

Upload Q3:

No file was uploaded

Question 4

Business Use Towns:

Upload Q4:

No file was uploaded

Question 5

Land delivery effectively:

Question 6

Agree?:

As a native of Westruther Parish I am interested in the proposal for that village, but I believe strongly that the views of current residents should hold more sway than mine. That said, I welcome any effort to bring sustainable business, and therefore employment, to rural areas, provided it does not unduly damage the environment and natural heritage.

Upload Q6:

No file was uploaded

Planning for housing

Question 7

Housing agree?:

Upload Q7:

No file was uploaded

Question 8

Housing countryside:

I particularly support the statement in para 5.9: " In the longer term it may be that ideas come forward for new 'stand-alone' settlements in high demand areas", while appreciating that any such proposals will have to be carefully considered. It follows that it may be useful to draft criteria in this respect for LDP2.

Upload Q8:

No file was uploaded

Question 9

Agree removed housing :

Supporting our town centres

Question 10

Core Activity Areas:

Question 11

Berwickshire supermarket:

Upload Q11:

No file was uploaded

Question 12

Develop contrib town:

Yes, but only where the development concerned does not create a significant impact on present conditions and infrastructure, eg if a development affected traffic volume/movement to the extent that physical traffic management measures were needed for road safety.

Delivering sustainability and climate change agenda

Question 13

Support alternative option:

The first sentence of para 7.17 states: "The Council will continue to follow national guidance and policy in taking appropriate measures to address climate change issues". I think most rational thinkers would agree that one of the meanings of 'appropriate' in this context is 'proportionate'.

The first sentence of para 7.17 states: "The Council will continue to follow national guidance and policy in taking appropriate measures to address climate change issues". I think most rational thinkers would agree that one of the meanings of 'appropriate' in this context is 'proportionate'.

Global greenhouse gas emissions in 2017 were 32,500Mte (million tonnes). Britain's were 375Mte and Scotland's about 10% of these. Thus Scotland, as Professor Jack Ponton points out, contributes about 0.113% of the global total. What this is likely to mean in terms of a contribution to increased global temperatures, and how much could Scotland's 'decarbonisation' contribute to climate change amelioration is further detailed by Professor Ponton below.

"The UN climate model which predicts end of century temperature rises of up to 4°C has in practice been found to be rather poor when its short term predictions are tested against observed changes. Danish statistician and environmentalist Bjørn Lomborg has used it, not to predict absolute temperature changes, but relative changes resulting only from changes in carbon dioxide emissions. These should be more reliable as this effect is believed to be better understood than many other factors such as cloud cover.

Specifically, Lomborg has used the model to estimate the impact of having all the signatories to the much-vaunted Paris climate agreement fulfil their (non-binding) commitments by 2030 and continue to honour them until the end of the century. The model predicts that the reduction in whatever temperature rise would otherwise have occurred would be a mere 0.17°C.

"The impact of all the EU commitments, including Britain's, would be 0.053°C. Britain's share of EU emissions in 2017 was 11.2%, so it seems reasonable to pro rata this temperature reduction, making our national contribution to saving the planet 0.00594°C. The UK commitment is to an 80% reduction in emissions so if 100% reduction were possible this would increase the amelioration to 0.00742°C.

"So what of Scotland? Since our emissions are about 10% of the UK's, we are responsible for around 0.000742°C of whatever temperature rise may occur by the end of the century. This is the amount by which complete elimination of all our greenhouse gas emissions from all sources could reduce the postulated increase in global temperature. It is also an amount which is so small as to be literally unmeasurable."

FREng, January 2019

Sources

<https://www.iea.org/publications/freepublications/publication/GECO2017.pdf>

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/695930/2017_Provisional_Emissions_statistics_2.pdf

<https://www.lomborg.com/press-release-research-reveals-negligible-impact-of-paris-climate-promises>

<https://ec.europa.eu/eurostat/documents/2995521/8869789/8-04052018-BP-EN.pdf/e7891594-5ee1-4cb0-a530-c4a631efec19>

This even-handed assessment means that the construction of any further giant, industrial-scale wind farms in the Scottish Borders will not be proportionate to the disbenefits of their impact on quality of residential life, landscape and visual amenity, as well as the ecology and environment of the Borders.

Within para 7.18 are the following sentences: "With the loss of feed in tariffs and grant aid it is inevitable that in order to increase efficiency and financial viability wind turbines will be manufactured to greater heights. It is anticipated planning applications for turbines up to and exceeding 200m will soon be submitted". While this may be factually correct in describing the likely intentions of wind energy developers, the assertion of inevitability could be deemed to be accepting that these larger turbines will have to be considered on the grounds of efficiency and financial viability. That would of course be misleading so I suggest different wording is used. I also suggest that, where the Council makes it clear that it must continue to judge applications against its landscape capacity and cumulative impact study, it should point out that the physical forms of a landscape, barring earthquakes or volcanic eruptions, are unlikely to change, and that therefore assessed capacity in 2016 remains valid and absolute, rather than relative to the increasing size of the turbines in applications. Landscape capacity does not change because financial feasibility is less favourable to developers. That would be like increasing the speed limit to 150mph because many cars are capable of that speed now.

Question 14

National park:

I strongly support the designation of a National Park within the Scottish Borders, for all the reasons that the Campaign has given (see Feasibility Study, Campaign Position Statement, and Economic Impact Study, all previously submitted to SBC and available to the public at http://www.borders-national-park.scot/feasibility_study.htm).

I believe that the area of the former county of Roxburgh, more or less, would readily meet the criteria for national parks, as well as providing a proven means of boosting economic development in a part of the Borders which has suffered economically, relative to the rest of Scotland and the UK, for many years.

I suggest that the question of whether towns close to the edge of whatever area might be settled upon should be in or out of the NP boundary should be left for those towns themselves to decide, eg through the relevant community councils and relevant SBC councillors. For instance, if Roxburghshire were settled upon, the towns of Hawick, Melrose and Kelso should be allowed to determine whether they are located inside or outside the boundary.

The decision to include the National Park proposal within this chapter of the MIR on Delivering Sustainability and the Climate Change Agenda may have had some kind of logic behind it. I sincerely hope the location was not calculated to ensure that wind farm developers (who might understandably focus in particular on this chapter, perhaps in some instances, to the exclusion of all others) were spoon-fed the opportunity to make negative comments about the National Park idea. I might not believe this, but any cynic or even any open-minded man on the Hawick omnibus might perceive that as a possibility.

The more logical thing to do in the final version of the Main Issues Report would be to include the main reference to the NP proposal in Chapter 4 on Growing our Economy (an aim which the Campaign Team believes to be the most significant for the National Park), with a cross reference in the chapter on Delivering Sustainability and the Climate Change Agenda.

I also suggest that the Main Issues Report consultation should not be the only means by which the Council assesses the NP proposal. Since a principle driver would be economic regeneration it will be necessary for the Council to consider how to adequately assess the economic benefits predicted, and any other economic impact.

Upload Q14:

No file was uploaded

Regeneration

Question 15

Agree redevelopment:

I agree with the proposed redevelopment sites and would suggest that the former primary school at Hobkirk should also be included.

Upload Q15:

No file was uploaded

Settlement Map

Question 16

Oxnam settlement:

Question 17

Core frontage Newcastleton:

Planning policy issues

Question 18

Agree amendments appendix3:

Any other comments

Question 19

Other main issues:

Landowner details

Have you submitted any site suggestions in this consultation?

Yes

If yes, please confirm the site and provide the landowner details (if known) for each site you have suggested.:

Hobkirk Primary School, currently owned by Scottish Borders Council.