

Response ID ANON-7TG7-FA29-U

Submitted to **LDP2 - Main Issues Report**

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Data protection

About you

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

██████████

Organisation

If you are responding as a representative of a group or organisation, please provide details below:

Organisation:

██

Name:

██████████

Job title:

████████████████████

Address line 1:

██████████

Address line 2:

██████████

Address line 3:

Town/city:

██████████

Postcode:

██████████

Contact number:

██████████

Email address:

████████████████████

Vision aims and spatial strategy

Question 1

Q1 Agree aims LDP2:

While appreciating the vision statement is taken from the SESPLAN it has to be said that it is very generic and could really apply to any rural area in the UK.

The third aim under communities appears to lack a verb? "Encourage" or "plan" might suit.

The second point under growing economy refers to promoting economic development along the railway corridor - but surely we should be promoting appropriate development across the three rural growth areas (if not the whole region) - perhaps especially along the railway?

While there is an ambition to promote economic development there is no reference to promoting social development eg healthy, dynamic, enterprising communities?

We consider the stated aims to be reasonable but we see them as unambitious. For example, there is an urgent need to reduce waste and to increase recycling. The aim of "making provision for waste management" is too passive. Likewise, "improving connectivity" is very passive. The need is to do everything possible to ensure that 100% properties have access to superfast broadband within a reasonable timeframe.

3.7 makes the point that action is needed to address climate change and promote a low carbon economy but there is no aim referring to community-based renewable energy. Should we not be aspiring to seeing more communities producing more of their own energy to help meet Govt, National and International targets? The report implies that the opportunity for more local renewable energy is limited by grid capacity, but this need not be the case if smart grid technologies are adopted.

Would it be possible to seek to ensure that all new housing is designed to require minimum heating and to generate as much renewable energy as possible (eg aligned to face south and incorporated solar panels). The same should of course apply to new public buildings such as the tapestry building and the proposed developments at Tweedbank. Adapting the right design and technologies ought to be reducing the need for heating in new buildings to a minimum.

Growing our economy

Question 2

Q2:

We have no particular view on this but would suggest that maximum flexibility would be beneficial.

Q2 upload:

No file was uploaded

Question 3

Settlement business allocated:

No comment

Upload Q3:

No file was uploaded

Question 4

Business Use Towns:

No comment

Upload Q4:

No file was uploaded

Question 5

Land delivery effectively:

No comment

Question 6

Agree?:

No comment

Upload Q6:

No file was uploaded

Planning for housing

Question 7

Housing agree?:

We are aware that the Netherbarns site faced strong opposition when it was suggested last time, and we are surprised that it is being put forward again. It would be interesting to know what has changed in the meantime. It could be argued that Abbotsford is now attracting significantly more visitors and playing an even more important role in the local economy - so there is even more reason not to threaten it with this development site.

We note that at least one site identified for development (Hawick) includes "wetland". We would suggest that such areas are likely to be of at least some ecological value and therefore worthy of careful survey before decisions are made. Such wet ground is unlikely to be ideal for development.

Is there a mis-match between the types of houses needed in the Borders (smaller, affordable units) and the types of housing being built (larger family homes? If so, can steps be taken to incentivise more of the former, perhaps by reducing developer contributions? Rural communities will need to have housing such that those on local wages can afford to live there. Communities could be helped to develop such housing themselves so that it is both locally owned and managed.

Upload Q7:

No file was uploaded

Question 8

Housing countryside:

We have had this debate many times and believe that appropriately sited and designed new homes in the countryside on a limited scale, can facilitate the development of new local businesses because the people who can afford such developments tend to be successful entrepreneurial types. This is the view of our colleagues in the Highlands who have pursued this policy for some time.

We suggest this policy might work, but steps would need to be taken to minimise the risk of simply creating additional retirement homes - which will then require

additional services to be delivered.

We would suggest that any such developments ought to be required to meet tight design standards and ideally be on or close to public transport routes. Steps must also be taken to ensure such developments do not have negative impacts on the network of paths and trails.

Upload Q8:

No file was uploaded

Question 9

Agree removed housing :

No Comment

Supporting our town centres

Question 10

Core Activity Areas:

We would support the proposal to maintain the core areas but with a greater degree of flexibility. If town centres are to be vibrant, they need to attract people and if shopping is no longer sufficient attraction, suitable alternative uses need to be encouraged.

Question 11

Berwickshire supermarket:

No comment

Upload Q11:

No file was uploaded

Question 12

Develop contrib town:

Yes - if there is concern about lack of development in agreed core areas - then removing additional costs for developers (even if for a temporary period) would seem a sensible incentive.

Delivering sustainability and climate change agenda

Question 13

Support alternative option:

In our opinion the aims in this section are too passive and unambitious. It is not enough to follow National guidance. Action is needed to encourage local change. As mentioned above, policy should be encouraging all development to be more energy efficient and to incorporate renewable energy generation. All development should be assessed to check it will support the aim of reducing carbon emissions.

Large scale windfarms have a role to play, but the benefits from these are not felt locally other than through voluntary "community benefit schemes". The Council should be seeking to support smaller scale renewable energy projects which are locally owned and managed. Grid constraints are real, but they can be overcome with the development of local smart-grids and through other new technology.

We support the reference to the Scottish Governments' Land Use Strategy, and we strongly support the approach taken by the Borders LUS pilot. If we are serious about sustainable land-use, we need to take this approach further and we need a well-informed local debate about the implications of the current push for increased afforestation. More woodland creation (right trees in the right place) would probably be a good thing. The benefits of a significant additional area of commercial forestry is more questionable for all sorts of reasons, one of which is the degree to which climate change will make such forests much more vulnerable to fire or disease.

A more diversified approach to the uplands especially could generate a range of public benefits (eg peatland regeneration, flood mitigation, enhanced landscapes, biodiversity, carbon sequestration and better access).

Question 14

National park:

We support further exploration of the benefits of a National Park. Having such a well recognised designation in the region is likely to attract new visitors and could encourage new businesses to start and existing businesses to grow.

We predict that the boundary of the park will be difficult to agree as it could potentially extend to cover the whole of the Borders - and indeed stretch into D&G. The boundary will also need to make sense on the English border (the boundary of the Northumberland NP does not make sense - as it stops at the border).

We have argued for some time that we could be making more of the existing National Scenic Area designations which, if better promoted, could attract additional visitors right now, especially the Eildon-Leaderfoot NSA which you can walk to from Tweedbank Station if you knew it was there.

Upload Q14:

No file was uploaded

Regeneration

Question 15

Agree redevelopment:

No comments

Upload Q15:

No file was uploaded

Settlement Map

Question 16

Oxnam settlement:

No Comments

Question 17

Core frontage Newcastleton:

No comments

Planning policy issues

Question 18

Agree amendments appendix3:

We consider policy ED9 to be weak. The SPG refers almost entirely to large scale windfarm developments, and therefore has little to say about potential smaller scale projects which could make a significant impact on local generation and on community resilience.

The policy should be promoting opportunities for range of smaller scale renewable energy generation projects.

HD1/2 - as mentioned above, we are concerned that current policy does little to facilitate the construction of single units in small rural communities where there is local need. Such single-unit development is considered to be too expensive, but the potential benefits of such units are significant. Policy should be to facilitate such development where possible.

EP4 As above we believe the NSA designations could be delivering much more for the Borders economy. Current policy appears to be to pretend they are not there.

EP16. It seems very odd that so little is said about encouraging renewable energy - and yet the potential negative impact of wood-burning stoves is flagged-up! The text must not, as suggested, blame "low carbon/renewables" as having a detrimental impact - the issue is the supply of damp logs. This could be addressed by licencing woodfuel suppliers to make sure only dry logs are supplied or by raising awareness of the problems caused by damp logs.

Any other comments

Question 19

Other main issues:

No other comments

Landowner details

Have you submitted any site suggestions in this consultation?

No

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