

Response ID ANON-7TG7-FA7V-W

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:

We are broadly supportive of the aims as described in the LDP2 MIR. We would suggest that the section on "Rural Environment" could be better phrased "Rural Development" especially given that in this context it is about digital connectivity and business diversification to support the rural economy.

SLE would also like to see the second bullet point under 3.8 "Growing Economy" refer to being flexible enough to promote appropriate economic development opportunities outwith the railway corridor as well. For example, agriculture, forestry or tourism businesses may be far removed from the railway but should not be restricted from growth because of the overarching strategy will only promote development opportunities within that corridor.

Growing our economy

Question 2

Q2:

We are of the view that the preferred option represents the most flexible alternative to the existing set up and we therefore support this option if the current set up is to change. We particularly welcome that for both the proposed use classes, other high quality complimentary commercial activity may be acceptable as well as non-industrial business / employment generating uses if they enhance the quality of the business park as an employment location. We see this as a sensible and pragmatic step.

Q2 upload:

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Question 3**Settlement business allocated:**

SLE considers its members are best placed to answer this specific question.

Upload Q3:

No file was uploaded

Question 4**Business Use Towns:**

SLE considers its members are best placed to answer this specific question.

Upload Q4:

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Question 5**Land delivery effectively:**

There are already significant actions being taken to support delivery of more business and industrial development as highlighted from paragraphs 4.1 to 4.11 of the MIR. SLE particularly welcomes recognition of the need to enable farm diversification and that more weight should be given to economic development benefits within planning policy for new businesses, leisure and tourism developments in the countryside. We consider the use of SPZs as a means of establishing more sites for delivery should be encouraged and we hold similar expectations that the Borderlands Initiative and the South of Scotland Enterprise will help to unlock commercial development land which can often be held up by infrastructure restrictions, particularly in rural areas. It is our view that the proposal for policy ED1 will provide greater flexibility which may assist in bringing forward more sites for business and industrial use.

SLE considers that there could be a more sophisticated approach to developer contributions protocol upfront. By setting out clear policies which incentivise business/industrial development upfront greater certainty is provided for everyone involved in the process, resulting in an increased likelihood of sites coming forward.

As an organisation, SLE supports greater collaborative working between public and private sectors to pool resources and deliver sites. Partners could pool land holdings, take shares in accordance with their share of land, borrow to finance the necessary infrastructure, and sell the land back to the shareholding members in pre-agreed proportions and locations at a value that would also take account of remaining obligations to be placed on developers. This would enable the funding debt to be repaid but leave landowners with incentives to carry out development in the plan. This approach shares development and financial risks for local authorities and landowners while helping to secure funding for infrastructure.

We would like to see greater priority given to mixed-use development in housing allocations, for example, where one or two appropriate commercial units can be included as part of a wider housing development. This would help deliver much needed land for commercial use and amenity within new housing developments.

Question 6**Agree?:**

SLE considers its members are best placed to answer this specific question.

Upload Q6:

No file was uploaded

Planning for housing**Question 7****Housing agree?:**

SLE considers its members are best placed to answer this specific question.

Upload Q7:

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Question 8**Housing countryside:**

SLE strongly supports the alternative option where individual houses could be constructed outwith building groups provided it is considered the design is of an exceptionally high standard and other policy requirements relating to appropriate setting, design and materials are satisfied. Availability of housing is crucial to the economy of the Scottish Borders. As has already been identified by the consultation (4.11), the ability of the rural economy to diversify will be crucial, especially as Brexit unfolds. Part of enabling this diversification will depend on the availability of housing in countryside to accommodate employees of growing businesses. Using the example of increased tree planting mentioned in the MIR, workers will be needed to manage new plantations and they will need houses, preferably within easy commuting distance to their work. It is our view that the alternative option allows for an appropriate level of flexibility that can help stimulate diversification and sustainably drive the economy of the Scottish Borders, helping rural communities thrive. We do not support the preferred option.

Upload Q8:

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Question 9**Agree removed housing :**

While we will leave comment on the specific site proposals to individual members who wish to respond, SLE as an organisation can say that broad proposals for removing allocations should be carefully considered. We appreciate the concerns highlighted in the consultation, but we consider that all means of facilitating development (particularly around removing blockages relating to infrastructure) should be exhausted before any decision to remove housing allocations is taken.

Supporting our town centres**Question 10****Core Activity Areas:**

SLE is in favour of the principle of Core Activity Areas as a driving force for ensuring appropriate action is taken to create and maintain thriving communities, however, will not make comment on the specific locations.

Question 11**Berwickshire supermarket:**

SLE considers its members are best placed to answer this specific question.

Upload Q11:

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Question 12**Develop contrib town:**

In line with a flexible approach which enables development that contributes to the resilience of our rural communities, SLE supports the general principle of this policy.

Delivering sustainability and climate change agenda**Question 13****Support alternative option:**

We consider this to be agreeable.

Question 14**National park:**

SLE takes a pragmatic view to the creation of new National Parks and is neither opposed to, nor an advocate for them. We have a broad membership that includes some members that would be very keen to see new National Parks, some that would be opposed and others that remain unsure. This spread of opinion is perhaps to be expected given the range of land-based activities members are involved with.

Below we highlight the five main areas SLE members have commented on in relation to a proposed National Park in the Scottish Borders.

Planning: It is understood that the Scottish Borders Campaign for a National Park (SBNP) are promoting an administrable 'lite' planning model, one which would leave planning with the Scottish Borders Council and would see the National Park acting as a statutory consultee in planning matters.

Uncertainty around what the actual planning model could be remains, with unease that a National Park could bring an increased level of planning regulation and/or restrict development and/or make the process of obtaining planning permission more arduous.

Land Management Activities: There is uncertainty about how a National Park could affect land management activities, forestry expansion in particular was raised as an area of concern. There is some apprehension that a National Park could restrict commercial planting in favour of small scale native woodland planting.

Housing: Affordable housing is recognised by members as being important to the Scottish Borders and is seen as crucial in terms of being able to retain and attract young people to an ageing population.

Affordable housing in both the Cairngorms National Park and Loch Lomond and the Trossachs National Park is currently seen by those communities as a big issue. For both these National Parks there are examples where the time and cost of obtaining planning permission has been disproportionate to development, resulting in the supply of affordable housing failing to meet the demands of local people, while elsewhere the establishment of National Parks has seen house prices rise as demands for holiday homes make housing too expensive for local people.

There are concerns that the above issues could be replicated in the Scottish Borders if the area was to become designated a National Park.

Tourism: The tourism opportunities a National Park in the Borders could bring in terms of 'putting the Borders on the map', branding of local produce, attracting tourists and wider local economic performance that could be generated for the region are well recognised.

While some members note the potential for enhanced business opportunities and diversification, other members feel the Scottish Borders already offers plenty of tourism attractions and opportunities which could be improved with better advertising, signage and road infrastructure; while others remain unconvinced about the added value a park would bring – with previous businesses having been established and then failed. For some the question remains 'why would a Scottish Borders national park make people stop, stay and spend money'.

There are of course strong and diverse views across the membership on how beneficial tourism would be in generating additional opportunities and how these could take place without impacting or conflicting with existing land management activities.

Unlike existing National Parks in Scotland and indeed Northumberland National Park, the Scottish Borders is intensively farmed. As such there is concern that in some areas tourism and intensively farmed areas could be in direct conflict with one another, with the assumption being that a National Park would bring increased footfall and is likely to magnify existing issues around irresponsible access and livestock worrying.

Board Representation

It is understood National Park Board Authorities are made up of appointments by Scottish Ministers, Local Authority members, and people who live in the area elected by the community, with legislation placing an upper limit on the size of the Board.

Whilst it is acknowledged that Scottish Land & Estates members would be entitled to stand for appointment, concern was expressed at the possibility that 40% of the National Park Authority Board could be comprised of people outwith the area who are not knowledgeable about the Scottish Borders local culture and economic drivers.

National Park Boundary

It is felt that the section contained within the feasibility study on proposed park boundaries and the rationale behind these is unclear and confusing, with the proposed four options difficult to understand – a point also acknowledged by SBNP. SLE suggests greater effort is needed to fully engage with stakeholders to better explain these options.

With regards to the proposed boundary prepared by the SBNP and contained within Appendix 3 of the Feasibility Study several comments were raised by SLE members about the omission of areas of great scenic and historic importance from the boundary. These included areas such as the Ettrick and Yarrow Valleys, Tweed Valley and the Berwickshire coastline (St Abbs Head, Eyemouth).

Upload Q14:

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Regeneration

Question 15

Agree redevelopment:

SLE considers its members are best placed to answer this specific question.

Upload Q15:

No file was uploaded

Settlement Map

Question 16

Oxnam settlement:

SLE considers its members are best placed to answer this specific question.

Question 17

Core frontage Newcastleton:

SLE considers its members are best placed to answer this specific question.

Planning policy issues

Question 18

Agree amendments appendix3:

As outlined in question 8 SLE does not agree with the preferred option outlined for the housing in the countryside policy.

Any other comments

Question 19

Other main issues:

None.

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.: