

Response ID ANON-7TG7-FA74-U

Submitted to **LDP2 - Main Issues Report**

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Vision aims and spatial strategy

Question 1

Q1 Agree aims LDP2:

We generally agree with the main aims of LDP2. We suggest a couple of minor changes to help these align with detail presented in the MIR and its SEA:

- Change the Communities aim of "Encourage better connectivity by transport and improve digital networks" to "Encourage better connectivity by sustainable transport and improve digital networks". We suggest this change as 'transport' could imply private and motorised vehicles only and therefore may not fully reflect the transport hierarchy. The MIR is clear that solutions including improved public transport and active travel will be sought and we consider that this amendment helps to highlight this.
- The Sustainability aim to "Encourage better connectivity" could be expanded on. We are unclear on what this encompasses.
- We recommend that the Sustainability aim of "Extend and improve green network opportunities and links" is amended to "Maintain, extend and improve green network opportunities and links". The addition of maintain would more clearly highlight that there is a positive existing resource in the Scottish Borders.

Growing our economy

Question 2

Q2:

The preferred and alternative options focus on use classes, we therefore have no comment to make.

Q2 upload:

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Question 3**Settlement business allocated:**

We have no comment to make, however we would be happy to provide advice on natural heritage opportunities and constraints in new allocations if any are proposed by other stakeholders.

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Question 4**Business Use Towns:**

Paragraph 4.7 of the MIR refers to "a broad area of search to the west of the settlement" in reference to allocating land for business use in Lauder. At present the potential area encompassed by this broad area of search is not explicitly set out. Our comments are therefore general and based on natural heritage assets that we are aware of in the general area west of Lauder.

The Lauder Burn forms part of the River Tweed Special Area of Conservation (SAC). The broad area of search should be included in the Habitats Regulations Appraisal of the LDP and an appropriate caveat should be included for all allocations in this area to ensure that project level Habitats Regulations Appraisal is carried out if required.

In the case of Town Yetholm, natural heritage assets include the River Tweed SAC and the Cheviot Foothills Special Landscape Area. The Pennine Way and St Cuthbert's Way long distance footpaths are also present to the east of the settlement. There are a number of designations around Kelso, including the River Tweed SAC and the Tweed Lowlands Special Landscape Area. The MIR does not set out where in Kelso or Town Yetholm that land may be allocated.

We therefore offer these general comments on features that may require assessment or mitigation and that may influence site requirements for any allocations. We would advise that any allocation is informed by relevant environmental assessment and that once a preferred site is identified that a design led approach is adopted to the necessary site layout issues, sustainable transport and landscape design/ placemaking issues.

We would be happy to provide further advice on these matters when more detail on location(s) is available.

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Question 5**Land delivery effectively:**

Delivery of sites is complex and many aspects are outwith our remit. We would however suggest that focussing effort and site design for business and industrial land on the unique natural assets of the Scottish Borders should be seen as part of the solution for effective delivery. Building brand identity and reflecting local sense of place, views and landscape character in well-designed business sites can speed up effective delivery for example. We are aware of various projects or initiatives that could feed into this thinking, including colour strategies for business / industrial buildings to both give projects unique identity and competitive advantage but also to reflect local landscape character.

Question 6**Agree?:**

Without changes to some allocation boundaries, selection of alternatives and the delivery of development frameworks and briefs, it may be difficult to achieve the place-making and natural heritage objectives set out in the MIR. In this regard we strongly recommend that the Proposed Plan should adopt a clear format to address these matters and to demonstrate how it will address the policy principles for the planning system as set out in Scottish Planning Policy.

Given the brevity of the site requirements provided in the MIR, we suggest that one role for the Proposed Plan will be to clearly set out what will be required of developers to ensure that their proposals secure and build on the assets of their locations. This could be achieved by including site development briefs for each of the allocations. Our comments on the preferred and alternative sites set out what these requirements may include in terms of natural heritage interests.

We do not have comments to make on all sites. However, we offer advice on the following:

BGALA006 - This site is for re-development of an abattoir and a former refuse tip. The proximity of the former refuse tip site (RGALA003) to the River Tweed SAC means that assessment and mitigation of impacts on the SAC will be required as part of the HRA of the plan.

It is not clear what the site requirement "there is moderate biodiversity risk associated with the site which must be given due consideration" refers to. As related site requirements refer to potential for protected species to be present, the supplementary guidance should make clear the need for survey additional to requirements that are identified through the HRA.

Further advice on habitats and species survey is available on our website:

<http://www.snh.gov.uk/protecting-scotlands-nature/protected-species/your-responsibilities/developers-and-builders/>.

BHAW1004 - This is a prominent site that could have significant landscape and visual impacts with the potential for large or badly sited industrial units to sit awkwardly in the foreground of views of Rubers Law and the Southern Uplands, particularly in views approaching Hawick from the north on the A7. Adverse effects on landscape character could be exacerbated by the rolling nature of the site's topography which may provide difficulties for the siting of large buildings. Careful consideration of height and location of buildings would be required in order not to exacerbate adverse landscape effects. If allocated, we recommend that

a strategic approach to development layout and landscape mitigation would be required. This should include its relationship with the adjacent preferred allocation at AHAWI027 and existing allocations BHAWI001 and BHAWI002. This should include requirements for:

- Green infrastructure connections through the site, including links to housing at Burnfoot and the existing path network to the east of Burnhead Road.
- Suitable densities of development on less sensitive parts of the site, avoiding the most elevated part to the east of Boorvaw Road.
- Close attention should be paid to the existing settlement edge and to maintaining key views from the A707 and the B6359.

MESHI001 - Development of this site would lead to a significant change in the landscape character of this area, which is currently rural and with dispersed dwellings. Despite its relative proximity to Peebles development of 200 houses on this site has the potential to be detrimental to landscape character and would lead to an isolated and low density development that is physically and perceptually detached from the town.

The draft site requirements in the MIR propose that planting, landscaping and shelterbelts will be required to provide mitigation and help integrate the site with its surroundings. At this location, we consider that such measures would change the character of this section of the Innerleithen Road, losing the sense of openness and views across this site towards Cardie Hill and Ven Law.

We consider that if allocating this site is required in order to meet housing requirements, part allocation in the northern part of the proposed site around Eshiels Steadings should be considered. Development here would form a less dominant feature and would be within an area where existing boundary features could be strengthened to further reduce impacts.

As with MESHI002, we strongly advise that if this site is to be allocated, in full or in part, that the placemaking aims for the site are clearly articulated in advance. We suggest that in combination with the neighbouring site at MESHI002, the design intention for neighbourhood functions, the urban form, the density of development and the approach to design led landscape mitigation, across both sites should be clearly set out by the LDP. We advise that in order to produce a coherent approach to a new settlement pattern in this location, an integrated approach to urban form which considers views and design relationship/ set back of development from the A72, will be required through a clearly communicated site development brief.

We would also advise that measures to support sustainable transport in the form of safe cycling and walking to Peebles, along the A72 are considered through the site requirements and in association with MESHI002.

MESHI002 - This site shares many of the characteristics of MESHI001 although the degree of set-back from the A72 offers somewhat greater potential to integrate this site with its surroundings and the local landscape character than the current boundary of MESHI001 would.

If allocated, a strong approach to place-making should be adopted in order ensure local identity and appropriate facilities are delivered, including green infrastructure.

As with MESHI1001, we strongly advise that if this site is to be allocated, in full or in part, that the placemaking aims for site are clearly articulated in advance. We suggest that in combination with the neighbouring site at MESHI001, the design intention for neighbourhood functions, the urban form, the density of development and the approach to design led landscape mitigation, across both sites should be clearly set out by the LDP. We advise that in order to produce a coherent approach to a new settlement pattern in this location, an integrated approach to urban form which considers views and design relationship/ set back of development from the A72, will be required through a clearly communicated site development brief.

We would also advise that measures to support sustainable transport in the form of safe cycling and walking connecting to Peebles, along the A72 are considered in the site requirements and in association with MESHI001.

MINNE003 - We agree with previous assessments of this site's potential landscape impacts and consider that the site should be partly allocated in order to avoid adverse impacts on the landscape setting and sense of arrival to Innerleithen.

If allocated in full, development here would be dominant in views towards the surrounding hills from the A72 on both arrival to and departure from Innerleithen.

Following a site visit, in order to minimise impacts on the attractive landscape setting of the village and the wider appreciation of the Tweed Valley Special Landscape Area, we consider that a part-allocation with the site boundary aligned to Tweed View would help reduce impacts by avoiding the introduction of development as a dominant element in open views. Should this not be achievable and the whole site was to be allocated we would strongly advocate a design brief to be secured in advance for this site. Key to reducing landscape impacts will be a high quality designed edge to development, perhaps including tight co-ordination of building frontage, the consideration of views, avenue planting and a multi-user path set back from the road edge.

We advise that any proposed allocation of this site should also secure links through the proposed site to connect with the Innerleithen-Peebles path.

SCARD002 - This site lies outwith the current settlement boundary as shown in the LDP and is within a Special Landscape Area. Due to its physical separation there is little relationship of this site to Cardrona or to Peebles and it appears likely that development here would essentially involve the creation of another standalone housing area. Due to the prominence and location of this site we advise there is a high potential for adverse landscape and visual impacts within the SLA, even with mitigation.

The overall assessment in Appendix 10 of the Housing SG was that the site is unacceptable due to high potential for adverse landscape and visual impacts and the need for a solution to access issues. The MIR proposes that the A72 could be re-routed through the site, with SEA site assessments noting that this section should function as a street.

We are not aware that effective mitigation has been identified to address landscape impacts and maintain our previous advice regarding the physical separation of this allocation and its potential landscape and visual impacts. We consider that there are other allocations in the Tweeddale Locality that could supply required housing numbers and which would not have adverse landscape and visual impacts.

If this site was to be safeguarded as a long term option we would strongly advocate that the placemaking issues are addressed in advance, with clear site briefing required to mitigate landscape impacts and successfully integrate development within the context of the A72 trunk road.

SPEEB008 - This site is partly within the Upper Tweeddale National Scenic Area (NSA). While this presents challenges, in this specific context we consider that potential impacts could be addressed in site requirements. The western part of the site, which is within the NSA, benefits from existing strong boundaries created by drystone dykes, hedges and individual trees. These features should be retained and form a key part of the structure/layout of development throughout this site, maintaining the quality of place within and adjacent to the NSA. We therefore recommend that the site requirement is amended from "Protect existing boundary features, where possible" to "Protect and integrate existing boundary features within the overall placemaking approach".

The MIR site requirements state that a masterplan is to be prepared. In addition to the retention of boundary features we recommend that the masterplan should be directed to include:

- Green networks through the site which integrate SUDS and active travel infrastructure, this should include providing links through the site to the nearby school.
- Recreational links, for example to Manor Sware viewpoint and the River Tweed should be retained or re-established in appropriate form.

In addition, site requirements in the LDP should clearly set out a requirement for Habitats Regulations Appraisal at application stage due to the site's proximity to the River Tweed SAC.

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

Without changes to some allocation boundaries, selection of alternatives and the delivery of development frameworks and briefs, it may be difficult to achieve the place-making and natural heritage objectives set out in the MIR. In this regard we strongly recommend that the Proposed Plan should adopt a clear format to address these matters and to demonstrate how it will address the policy principles for the planning system as set out in Scottish Planning Policy.

Given the brevity of the site requirements provided in the MIR, we suggest that one role for the Proposed Plan will be to clearly set out what will be required of developers to ensure that their proposals secure and build on the assets of their locations. This could be achieved by including site development briefs for each of the allocations. Our comments on the preferred and alternative sites set out what these requirements may include in terms of natural heritage interests.

We do not have comments to make on all sites. However, we offer advice on the following:

AGREE009 - We note the proximity of the River Tweed SAC and advise that this site should be included in HRA of the plan.

We advise that a site development brief should set out the site requirements for this prominent gateway site. Establishing an appropriately designed landscape edge, a co-ordinated approach to development frontages and exploring the potential for path connections to promote cycling and walking on off-site access routes (such as the use of the disused railway) should be explored and details clearly set out in site requirements.

ACOLD014 - Our previous advice on this site was that it "lies outwith the current settlement boundary as shown in the LDP but is included as a longer term safeguard (SCOLD001). This would form a significant addition to the existing settlement and would therefore need to ensure measures to deliver natural heritage mitigation and enhancement as part of any future site development."

Expanding on this earlier advice, we recommend that:

- New structure planting/ landscaping, should be planned to improve the setting of the site and to establish a framework for delivery of the remainder of the long-term safeguard site (SCOLD001).
- Existing shelter belts should be retained and enhanced with additional planting. Suitability of locating active travel routes along these linear features should also be considered due to their potential role in providing setting and shelter for users.
- Open space should provide multiple benefits and be linked into wider habitat and active travel networks.

AJEDB018 - Site appears to be infill between existing housing at Howdenburn Court and existing allocation RJ2B.

The adopted Planning Brief for Lochend identifies pedestrian links between RJ2B and Howdenburn Court. These links should be designed into any allocation at AJEDB018. Design and landscape principles set out in the Planning Brief should be applied to this site.

AANCR002 - This site lies outwith the current settlement boundary as shown in the LDP and is within a Special Landscape Area. If you are minded to support development of this site during the current plan period, further detailed assessment will be required. Given the site's location within a Special Landscape Area we recommend that this site is subject to a development brief which should set out the approach to placemaking and the measures necessary to integrate development within its wider landscape setting.

ADARN005 - The majority of the site lies within the Eildon & Leaderfoot Hills NSA. The site also forms an important context for, and a gateway to, Darnick. Its location within the NSA means that a high standard design will be required.

Given the site's sensitive location, its mature trees and boundary features we consider that a more specific set of site requirements should be drafted for this site in the form of a site development brief. This is in order to mitigate adverse impacts on the NSA and to ensure the delivery of a high standard of development, including materials, siting and design.

Without the benefit of further verification from a site visit, at this stage we suggest that specific advice is needed secure the retention of important trees and boundary within an overall placemaking and site design approach. For example,

"Retain and protect the existing boundary features and trees, where possible" should be altered to "Retain and protect the existing boundary features and trees, integrating them appropriately within an overall layout which demonstrates a co-ordinated approach to placemaking".

AGALA029 - Our previous advice on this site was that it "lies outwith the current settlement boundary as shown in the LDP.

We understand that the site was included as an allocation in the Proposed Plan but, in their report of examination, the Reporter recommended its deletion. This recommendation was based partly on landscape impacts. We are not aware of a potential solution that should change that decision."

We do not consider that this situation has changed and we consider that this site should not be allocated due to the previously identified landscape impacts.

AMELR013 - The site lies within the Eildon & Leaderfoot Hills NSA. While well contained, the site makes an important contribution to the character of St Mary's Road. The boundary wall, mature trees and orchard combine to give a strong sense of place. We have concerns regarding the allocation of the site.

Our advice is that the western, slightly elevated, area of orchard should be retained and enhanced through the creation of an enhanced orchard around the remaining trees. Other existing assets such as the boundary wall on the south edge and the mature beech trees on the north edge should also be retained for their contribution to the local environment and the sense of place.

Promoting higher density of development within the remainder of the site could create a development that is in keeping with the wider area, establishing a place

that could be adaptable for all stages of life and which is well connected to the town centre. We consider all such details should be communicated by a site development brief.

AHAWI027 - We welcome the intention to prepare a site development brief for this proposed allocation. As recommended for BHAWI004, we consider that a co-ordination between sites will be needed in order to maximise benefits for placemaking and landscape mitigation/ green infrastructure connections. Close attention should be paid to the settlement edge and to maintaining key views and the character of the approach to Hawick on the A7. Site requirements should include:

- Green infrastructure connections through the site, including links to housing at Burnfoot and the existing path network to the east of Burnhead Road.
- Establish SUDS as part of green network in south-western corner of the site.
- Close attention should be paid to the existing settlement edge and to maintaining key views from the A7 and the B6359.

ADOLP004 - Our advice on this site is based on prior knowledge and desktop assessment using GIS and streetview. We may provide further advice based on a site visit if the potential allocation is carried forward.

This section of the A702 is characterised by small groups of houses, often screened wholly or partly by well-established woodland and boundary planting. If allocated, we recommend that a site brief is prepared, this should include:

- Retention of woodland along the A702 boundary of the site;
- Maintain and enhance pedestrian and cycle access established by LDP1 allocation ADOLP003.

APEEB056 - The outlying and linear nature of the site is likely to result in development that is physically and perceptually detached from the rest of Peebles. The general sense of openness and the rolling nature of the topography could also accentuate these issues. In overall terms we highlight that this site, even with landscape planting and retention of stone walls, could result in a settlement extension which appears incongruous and detracts from the existing landscape setting of Peebles.

The western part of the site is on a slope that would require significant cut and fill to achieve development platforms. Development of this part is likely to intrude on views from the A703 across to Hamilton Hill and the setting of the Cross Borders Drove Road.

If allocated, we suggest that the western part of the site should not be included and the rest of the allocation should be subject to the following site requirements:

- Active frontages along the Chapelhill Farm road.
- Pedestrian and cycle access and links to existing networks to the town centre should be established.
- Boundary planting along the eastern boundary should be established to maintain the rural setting of views from the A703.

AEDDL008 - This is a large and partially open site on undulating ground. The proposed density of development over the site is very low and it is unclear how the proposal would seek to integrate or respond to the settlement character and siting principles established within the existing village.

If allocated, we advise that a design brief should inform what would be intended for the development layout. Existing features such as the hedgerow should be retained and appropriate improvements made to allow safe access to the rest of the settlement established. For example the provision of pavements along the main road and access connections from the site to and through Elibank Park to Station Lye should be established.

AEDDL009 - The site presents similar issues to AEDDL008. We highlight the potential for a planted linear path or green network along the dismantled railway to the east of the site and connecting to and through Elibank Park. We recommend that if both are to be allocated in the next LDP a planning brief for both sites should be prepared.

SPEEB009 - This site is physically detached from Peebles and appears unlikely to be developable according to principles being established by the MIR, particularly in relation to sustainable places. If allocated and developed it may lead to further future development along this road, further establishing a sprawling development pattern of places that have little relationship to the town and which are heavily reliant on car use.

Upload Q7:

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Question 8

Housing countryside:

We have no settled view on this matter. We would be supportive of policy wording for either option which supports the delivery of well sited and appropriately designed rural housing.

Upload Q8:

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Question 9

Agree removed housing :

The current Infill Development policy (PMD5) sets out criteria that non-allocated sites must satisfy. It also states that developers are required to provide design statements as appropriate.

The sites in Table 5 (page 44) of the MIR have site requirements set out for them in Part 2 of the current LDP. These site requirements would inform required design statements. Therefore, while we do not disagree with their deallocation we have some concerns regarding how the requirements, which were considered necessary at the time of LDP1, would be applied to these sites if proposals came forward in the future.

Supporting our town centres

Question 10

Core Activity Areas:

No comment.

Question 11**Berwickshire supermarket:**

No comment.

Upload Q11:

No file was uploaded

Question 12**Develp contrib town:**

No comment.

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

We support the preferred option.

In relation to the Main Issue set out at paragraph 7.17, safeguarding routes for pipework is a key policy element identified by Scottish Government in their guidance on Planning and Heat . We support their recommendation that a key focus for planning authorities should be to “secure integration of heat networks and associated energy centres within multi-functional green networks.”

Planning for heat network infrastructure within green infrastructure and green networks should minimise disruption if infrastructure is either to be delivered at a later date or when maintenance is required. Delivering pipework that is integrated within open space and green networks could also be considered as efficient use of land as set out in Scottish Planning Policy. Identifying such multi-functional corridors at the LDP stage and in association with other aspects of sustainable growth, such as active travel routes, could also be considered useful to deliver on core aims of the planning system. We would support clear identification of these issues in LDP2.

Question 14**National park:**

Our Policy Statement Scotland’s National Parks (Policy Statement No 02/04) sets out our position on this issue. At this time, our priority and focus remains the operation of Scotland’s first two National Parks.

We recognise that the evolution of other Parks may involve different models to those employed in Loch Lomond & the Trossachs or the Cairngorms, for example embracing sea as well as land, or resting in a single local authority area. Our view is that proposals for additional National Parks should emerge from a broad consensus involving local community stakeholders and from Government and other national interests, as well as fulfilling clear aims for the management needs of an area and its outstanding natural heritage. Should proposals emerge for a National Park within the Scottish Borders, we would engage as part of these wider discussions.

Upload Q14:

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Regeneration**Question 15****Agree redevelopment:**

As these sites involve existing buildings that would either be redeveloped or demolished for redevelopment of the site, the potential for the sites to host roosting bats should be considered in all cases. If allocated, each site should include a requirement for bat survey in the site requirements.

In terms of individual sites, the following should be included in site requirements:

RJEDB003 – proposals should maintain and enhance existing access routes through the site, including at Grieve Avenue where there appears to be an opportunity to establish or formalise a connection from adjacent open space through the site to Howdenburn Drive.

RJEDB004 – integrate site with existing footpath network along southern boundary.

RJEDB005 – the eastern site boundary is contiguous with the River Tweed Special Area of Conservation. The site should be included in the Habitats Regulations Appraisal of the LDP and a requirement for assessment should be included in site requirements. Existing woodland along the site boundaries should be retained and integrated into development.

RJEDB006 – this site appears to host a pedestrian link between High Street and Friarsgate, via the school grounds. This link should be retained and enhanced when the site is redeveloped. Given the site’s proximity to RJEDB005, a good outcome for redevelopment of both and placemaking in this part of Jedburgh may

be to prepare a planning brief for this area. Such a brief should include issues highlighted for each individual site as well as their relationship to each other, for example links between and through and opportunities to connect existing green networks through this area.

RHAWI017 – the site's existing use appears to offer few opportunities to make connections between Howiegate and Buccleuch Street. Subject to the extent of change of existing buildings, redevelopment of the site may offer an opportunity to establish more direct links for walking and cycling between these streets.

Upload Q15:

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Settlement Map

Question 16

Oxnam settlement:

We note that the proposed settlement boundary is contiguous with the boundary of the River Tweed Special Area of Conservation in places. While the European site would be a consideration whether Oxnam was designated as a settlement in the LDP or not, we recommend that the settlement statement includes clear reference to it and sets a general requirement for Habitats Regulations Appraisal of any forthcoming proposal(s).

Question 17

Core frontage Newcastleton:

No comment.

Planning policy issues

Question 18

Agree amendments appendix3:

We generally agree with the policy amendments presented in Appendix 3. However, we have the following comments to make on policies relevant to our remit:

PMD2 Quality Standards - We understand that this policy requires some update in respect of criteria on energy supply and digital connectivity. In reference to our response to Question 13, we suggest that the policy should include the role of green infrastructure as means of safeguarding access to pipe and cable runs. A policy cross-reference to Policy EP12 may be useful.

ED7 Business, Tourism and Leisure Development in the Countryside - The reference to cross-referencing to the Woodland Strategy implies that one of the likely diversification measures envisaged would be woodland planting. We support Scottish Government's policy aims for woodland retention and expansion in Scotland. Nevertheless, we consider that careful consideration will be required for this policy topic. Important natural heritage resources such as carbon rich and peat soils would require careful consideration and we recommend that such issues are carefully considered in supporting text and through cross-referencing of relevant policies such as Policy ED10.

It seems likely that further diversification and development is likely to be associated with tourism. An example of this can be seen in the emerging proposals for a mountain bike innovation centre in Innerleithen. As there are a number of potential cycling related proposals emerging from the Borderlands Growth Deal it may be useful to review part b) of Policy ED7 with a view to relevant documents such as the Scottish Borders Cycle Tourism Strategy 2016-2021.

ED8 Caravan and Camping Sites - We welcome the proposal that caravan and camping sites should be subject to "high standards of placemaking and design".

ED9 Renewable Energy Development - Paragraph 159 of Scottish Planning Policy states that "Local development plans should identify where heat networks, heat storage and energy centres exist or would be appropriate and include policies to support their implementation." As noted in response to MIR Question 13 and our comment on Policy PMD2, Scottish Planning Policy also emphasises the importance of safeguarding piperuns for later connection. As green infrastructure can play a role in such safeguard areas we recommend that update of Policy ED9 should include a cross-reference to Policy EP12.

ED12 Mineral and Coal Extraction - We welcome the proposal to amend the policy wording for sensitive receptors. As the policy does not currently include a peat specific criterion, we suggest that this forms part of the amendment, for example, "There will be a presumption against peat extraction and other development likely to have an adverse effect on peatland and/ or carbon rich soils within Class 1 and Class 2 peatland areas."

HD2 Housing in the Countryside - We have no settled view on this matter. We would be supportive of a policy which supports the delivery of well sited and appropriately designed rural housing. We would be happy to provide further advice on this matter.

EP10 Gardens and Designed Landscapes - The policy reference to be made to the Peter McGowan Consultants study on Gardens and Designed Landscapes is unclear at this stage. We understand that it would not be firmed up until the Proposed Plan is drafted but suggest that reference to Annex 3 would be particularly useful in a policy context. Annex 3 provides guidance on management and restoration of these sites with part 4 of the Annex setting out design principles and common issues that we consider would provide essential direction for any planning application within or adjacent to a garden and designed landscape. We also advise that clear differentiation should be provided in the policy between the relative importance of sites that are on the National Inventory of Designed Landscapes in Scotland and those identified by the Peter McGowan study.

EP14 Coastline - In the future, Local Authorities and the Marine Planning Partnerships (MPP) should work together to ensure planning coherence across the land-sea interface. It is important that this extends beyond the jurisdictional overlap of the intertidal zone, as activities far inland can have implications for marine health and all human activities have a connection to and therefore an influence on land. Prior to the establishment of the Forth & Tay Marine Planning Partnership, Scottish Borders Council should work to ensure coherence with the National Marine Plan (NMP). The NMP is a statutory plan with policies relevant to all public authorities, including those whose responsibilities are primarily land-based. Policy GEN 15 of the NMP (Planning alignment A) is of particular

relevance to local authorities.

We suggest that Policy EP14 should be reviewed and updated to ensure the required complementary policies and practices are in place. This would be in accordance with Circular 1/2015: The Relationship Between the Statutory Land Use Planning System and Marine Planning and Licensing.

IS13 Contaminated Land - We are generally content with the current wording of the final sentence of paragraph 1.1. However, we think it may be useful to provide a reference to our checklist on 'How and when to consult Scottish Natural Heritage' as the situations in which we would wish to be consulted do extend beyond designated sites in some instances. Our checklist is available here:

<https://www.nature.scot/professional-advice/planning-and-development/consulting-snh-planning-and-development>

Cemeteries - The introduction of a policy-based approach to cemeteries offers an opportunity to develop an approach that is place-based and which integrates these into the wider green network. While the primary role of cemeteries is commemoration of loved ones, we would welcome a policy that acknowledges their wider role as important green spaces for towns and villages. The policy should also encourage proposals for new cemeteries or extensions to existing cemeteries to design in natural features that are beneficial to visitors for their aesthetic properties and to biodiversity for their role in wider green networks.

Dark Skies - There are a range of approaches to policy for protecting and promoting dark sky areas. One of these is the designation of a Dark Sky Park, as in Dumfries & Galloway at Galloway Forest Park which has also been given Dark Sky Park status. The other approach is to promote an area as a Dark Sky Discovery Site, which there are several of throughout Scotland. The proposal to adjoin the potential Dark Sky policy area to Kielder, which is already part of a Dark Sky Park, suggests that policy in LDP2 should seek to support existing approaches in policy for the Dark Sky Park.

We are aware that in other areas, such as Dumfries and Galloway, the policy in the LDP is relatively short, with detail on lighting requirements for development proposals set out in Supplementary Guidance.

We support the principle of a dark skies policy and would be happy to provide further advice as the Proposed Plan is developed.

Any other comments

Question 19

Other main issues:

No comment.

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.: