

[REDACTED]

From: [REDACTED]
Sent: 11 February 2019 11:36
To: [REDACTED] (Planning HQ)
Subject: FW: NDCC submission to SBC ref MIR local plan development Nov 14th 2018
Attachments: NDCC submission to SBC ref MIR local plan development Nov 14th 2018.pdf

From: Secretary [mailto:[REDACTED]@newcastleoncommunitytrust.co.uk]
Sent: 15 November 2018 06:29
To: [REDACTED] <[REDACTED]@scotborders.gov.uk>
Cc: [REDACTED] <[REDACTED]@scotborders.gov.uk>; [REDACTED]; [REDACTED]
Subject: NDCC submission to SBC ref MIR local plan development Nov 14th 2018

Hi [REDACTED]

Many thanks for coming to see us on Tuesday, delighted the turnout was positive for you and there was much discussion.

We think SBC know all our concerns, some of which are planning, some of which are governance and some are frustration! The CC understands that your efforts can only deliver so much and the majority of any change from your perspective will be following flood defences. The attached submission covers it all so others who will read this can still see the wider challenges that we face. However both dark sky and conservation can be effected without constraint, we look forward to seeing these being adopted as the development plan is completed. Also included is a very firm statement ref the community's position on the National Park!

I have included the response info from our summer consultation to support dark sky 98%! NDCT hope to commence the study early 2019 once capacity and budget can be sourced. We can update SBC on the likely local catchment hopefully mid-year, but we are aware of other communities wishing to seek dark sky too, as these evolve via your discussions please share our plans so we can work collaboratively if needs be.

Between now and the formalising of the process the CC hopes that planning decisions for windows and doors specifically can be considered from a longer term perspective going forward. We understand that formally adopting change takes time but some homeowners need to take action to remedy their homes well within a 2 to 3 year period and it makes no sense not to employ the latest modern techniques in this process. We will do what we can to ask SBC to adopt a lenient approach until the conservation status is confirmed.

Please do let us know if there is anything further you need.

Thank you and Karen once again for taking the time to come down and answer questions, the CC is grateful for your efforts and advice. Please forward this to [REDACTED], I don't have her email contact.

Regards

[REDACTED], Secretary
Newcastleon & District Community Council

[REDACTED]

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The CC had fed into the MIR with previous correspondence and was pleased to see two main local issues had been included; provision for Dark Sky policy and local changes to the Conservation Status so that a more lenient approach could be adopted.

Other main issues identified continue to stifle opportunity and growth in our neighbourhood are: flooding, housing need (new development opps), connectivity and communications outside the heartland, transport (lack of and impact of timber transport), landscape; windfarms, forestation and upland planting controls, joining the public highway protocols as well as Dark Sky and Conservation status. Newcastleton also confirms its continued objection to the proposed National Park.

The following comments expand on these issues and we ask SBC to consider our comments in the Local Development Plan proposals still to come:

Flooding

Without a flood defence strategy investment and growth cannot be encourage or expected from new business. This is stifling expansion for commercial operations and new housing and limits development at the south end of the village as well as across the Liddel.

Housing needs

- a. Previous unsociable behaviours encountered as a result of urban families occupying social housing has meant that local families have not felt comfortable applying for family homes in the community, this is now not the case. Local families are actively encouraged to apply for these homes so that we do not continue to see migration of young families which impact on local services and amenities with concern for the primary school. Homeownership or long tenancies for young families **MUST** be more readily achievable or Newcastleton will become a village of pensioners.
- b. In addition, the local housing study undertaken in 2015 identified need as being **ground floor 1 & 2 bed properties** to home elderly who would downsize from larger properties needing investment, freeing these for young families. This needs consideration within the local plan with sites allocated to encourage development and investment for ground floor builds – the estimated increase in the aging population for our village is alarming, planning locally needs to address that now. *NDCC recognise that new modern housing cannot be provided without a flood scheme.*
- c. There is desire locally to have modern, fit for purpose, family housing by private developers. Many young homeowners are frustrated with current housing stock which is old and needs modernising. With investment in flood defences this can become a reality.

Connectivity and communications

Without robust communications business and community development is stifled; superfast is now available within the heart of the village but delivery to the outskirts and wider reaches is still very hit and miss.

Transportation

Improved signage directing vehicles from the trunk roads needs to be considered to support services and amenities. Our road network continues to be hugely damaged by HGV's and timber wagons travelling where they shouldn't be. Timber Transport voluntary code of

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practise needs to be enforced and fines made to drivers/contractors who abuse the road network. Necessary resource needs to be found to enforce these guidelines.

NDCC reiterate that the community is keen to work with SBC to explore the outcomes of the transport feasibility study which offers massive opportunity locally to give us better transport connections and consider rail beyond just passenger to include freight.

Landscape

1. **Wind farms** There is much debate about the encroachment of wind farms which can impact the community in many ways. Of concern are transportation issues during construction phases (as above), and the increased heights now being sought by developers to off-set subsidy withdrawal, resulting in very large turbines being considered.

NDCC acknowledges that wind farms play a very large part in the Scot Gov renewable energy policy and we, more than most, are playing our part in working with developers to ensure the best outcome for all. Newcastleton continues to ask SBC to defend iconic landmarks so that views and experiences of visiting these are the same for future generations as they were for the previous ones. So much of our local economy depends on our surroundings which are precious.

Newcastleton is seeking Dark Sky Status for a wide catchment area that surrounds us and hope to have secured this within a 3-year window. It will be important that any lighting required on developments within this catchment employ appropriate lighting measures to ensure that the dark sky status is not impacted.

We continue to ask why planning policy cannot include Community Benefit Funds as a condition of the planning if it should be granted? Government subsidy is now removed so this is by no means a given now and developers have no obligation to provide one. NDCC fully understand that CBF is not a material consideration during the process and agree with that principle, BUT if planning is granted why can't it be made a condition of the planning and linked to the development itself not the developer? Without formal recourse to protect the community we cannot seek to benefit from the funds that have been ring fenced for our needs. Communities have no capacity to sue companies who ignore protests if change of ownership or circumstance suit their needs. NDCC appreciate that local planning policy follows national guidelines but urge SBC to lobby for change so that the CBF's can be used and administered to the communities they were designed to appease.

2. **Connections** – R100 remains a challenge for the extremely remote and rural residents, new grid connections are an avenue open to use to extend the digital highway once wind farms are approved. We encourage SBC to ensure that all efforts are taken to ensure this can be exploited as part of the planning approval process for grid connections.
3. **Forestation/planting** This continues to encroach on open farmland, particularly the upland pastures. Planning for planting is devolved to FCS which again further removes the community's role in consultation and recourse in the event of problems. SBC will be aware of issues caused by felling and planting at Lauriston caused adjoining residents' problems because the planting plan was not adhered to.

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4. **Sightlines** – given the challenges of getting connectivity into the valleys and wider landscape it is imperative that treelines/heights are policed so that delivery of line of sight masts (should these be the solution for R100) be clear. Currently, it is our understanding that they are not, and the FCS are under no obligation to consider this. We consider this should be a material planning consideration and be enforceable to ensure that connectivity can be delivered to the difficult to reach places. This needs to be in place to ensure that tree growth over time does not inhibit service delivery.
5. **Private planting on estates governance** communities are challenged by the rules governing private planting on estates v public planting and why one has consultation and the other doesn't? One is managed, the other not. Community feedback is welcomed in one and listened too with politeness and ignored on the other.
6. **Flood implications** NDCC are also hugely concerned that planting on private estates is not included in flood assessment planning, is not published and extractions not managed in the same manner as public estates further down the line. This has huge potential impact for the longer term unless steps to manage this are included at the outset of any flood scheme.
7. **Right to join the public highway?** Better protocols and consultation regarding wood extraction and new connections to the public highway. Recent wood extractions using temporary forest roads joining the carriageway (on bends that are already more prone to road wear), resulted in major damage in a concentrated area making usage impossible and resulting ultimately in road closures which has huge impact on our community. This needs better assessment.
8. **Implications for Rural Land use following Brexit** – many will need to diversify out of necessity not choice; planting is one of these options and we have already discussed planting on large swathes of local land and our concerns regarding this. The community fears for the traditional upland farm for which our present geology is suited, any decline in this will also impact on traditional skills like dry stone walling and hedging further impacting on the natural environment and eco systems that rely on them. There does need to be wider debate about what happens post Brexit and Newcastleton would be keen to participate in this debate at the appropriate time.

Dark sky - how might this work? New policy provision will be included in the new development plan which is welcomed. This will relate to lighting for new builds within the designated zone once this is established. Initial thoughts for the catchment are the forest adjoining Kielder, which is already dark sky, and as much of the catchment spreading north, south and east as is practical; predominantly land used for forestry and farming.

NDCC supports the Newcastleton Business Forum (NBF) and the Newcastleton community Development Trust (NDCT) in their ambitions to develop this to enhance local trade during the off season when the dark sky market peaks and believes Dark Sky status will have wider benefit to other local communities.

Community support for Dark Sky

Newcastleton & District Community Trust (membership 300) undertook a large community consultation during summer 2018 covering a wide range of issues to help devise the next

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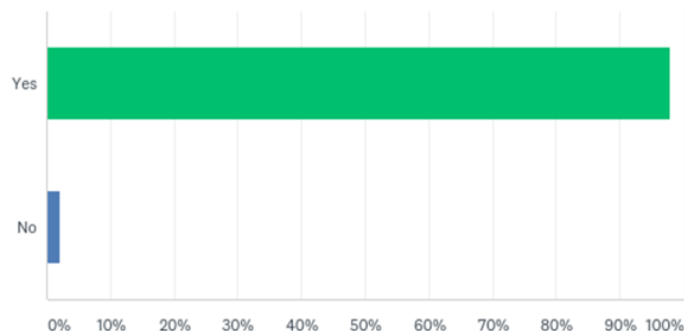
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phase of our community development plan; 63 attended focus groups, 80+ attended the feedback sessions and 216 useable questionnaires representing 305 individuals were returned.

This participation meant well over 1/3rd of the population participated in the study, a huge response. Amongst new project/development proposals they were asked to comment on Dark Sky

- We want to see more done to ensure that our community and surrounds are protected and awarded Dark Sky status.
- This will give Newcastleton a competitive advantage and attract visitors to see our amazing skies at night, particularly during the traditional off-season from Nov-Mar, benefiting local businesses and securing jobs.
- Experts will determine exactly where the boundary of Dark Sky would extend, based on current light values, and if necessary, implement a light pollution strategy to be adopted within a geographic boundary. This is likely to receive grant funding because of the economic benefits to our community and the wider area.

Q17: Do you support the concept of extending Dark Sky status from the Northumberland National Park to include Newcastleton & Hermitage catchment?



Conservation area – NDCC is pleased to see acknowledgement that the status is included for review. Many who visited the exhibition support the view that the restriction covering frontages should be dropped but the reason it was awarded should remain; a planned village built on a grid. This will enable homes to be upgraded and to capitalise on modern standards for windows, doors and renewable roof arrays if required or desired. NDCC sought clarity on the timetable for formal decision which is unlikely for 2/3 years. As this was a local matter with huge support it was felt that there was benefit in writing to SBC to seek leniency for applications between now and then. The view of officers was that this was not guaranteed and unlikely to be granted.

Opportunities for Carlisle airport – this has a one-line reference within the MIR which is hugely disappointing given that the airport is owned and operated by the UK's largest private freight operator Stobart's. NDCC recognise it is in England and the MIR is about development and planning in the Scottish Borders, but Newcastleton is their nearest Scottish neighbour,

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surely the airport deserves bigger consideration than this given the opportunity it could provide us and the wider Scottish Borders?

Newcastleton & District Community Trust and NDCC discussions with Stobart to date indicate huge willingness to forge development dialogue and explore opportunities cross border. Newcastleton believes that the airport will deliver an affluent southern based visitor as well as opportunity to tap into jet-set international markets that use the airport. This valuable tourism pound should be being actively attracted to travel north to exploit the Scottish Borders and Scotland. SBC need to work with other public sector partners to make this happen and to ask Carlisle council and Stobart how we can work together to exploit this development.

Additionally, given Stobart's freight experience, reputation AND their proximity to the old Longtown freight depot there is HUGE opportunity for rail to be developed for freight. This opportunity is on our doorstep and needs much more effort to understand and explore the potential this could deliver as part of the economic benefit of extending the railway line to Carlisle and embracing freight.

NATIONAL PARK

NDCC have commented previously via various meetings and Cllrs about concerns and note that none of these have been addressed in the recently shared Economic Impact Assessment:

Risk Assessment/SWOT analysis No details on risk assessment or a SWOT have been included in the EIA giving a very biased impression that all outputs will be positive. NDCC do not believe this to be the case particularly given our knowledge of local issues and challenges which already impact on our small rural and isolated community and are previously highlighted. Among the benefits highlighted in the EIA are *Tourism, Halo effects, Attraction for businesses and Housing*. We take the opportunity to comment on each of these in the context of our community:

Tourism – there are no detailed statistics to back up any claims, nor any quantitative data to support the argument that tourism numbers will swell by the amounts they claim.

The sector pays one of the lowest wages in Scotland and it is a stated objective of SoSEP that this needs to be addressed as part of the new remit covering the south of Scotland, creating a national park linked to tourism will not help deliver that aim.

Newcastleton wishes to retain its young people ensuring we continue to grow and develop with thriving local amenities. Whilst investment in new assets will be for the wider community, any assets must also enhance our tourism proposition helping to attract more markets throughout the year. This approach, led successfully by The Newcastleton Business Forum and Newcastleton Community Development Trust, has done much to ensure assets are developed to meet this aim. Constraining or inhibiting this strategy in any way imposing barriers to investment, development or slowing major capital infrastructure projects like R100 (digital broadband) and transport networks, will impact on the community development plan and ultimately our fragile economy.

Newcastleton's micro economy is hugely dependant on tourism, if we believed that being part of a national park would deliver monetary returns, we would support it. We believe that by

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investing in our own tourism assets and marketing them successfully we will grow our local economy faster and without constraint. We want NO BARRIERS to obstruct us in our ambitions.

VisitScotland will confirm that the marketing model to attract visitors has changed hugely to what went before social media and new technologies. One size does not fit all and having a 'brand' or an umbrella under which we all belong will do nothing for attracting new markets. Visitors come for an '*experience*' and then talk about it, via social media. This makes it affordable for individual business to market themselves and for communities like ours to build a brand that fits *our* place NOT have to work to fit a regional or national strategy that has no significance to us. Having a National Park will not enhance our marketing message, if anything, it puts everything on the same page; '*Newcastleton, part of the Scottish Borders National Park*' has no point of differentiation to any other place within the national park, where is the value in that?

Since 2004, following the Foot & Mouth outbreak that 'closed the countryside', Newcastleton has successfully created a tourism market based on the significant investment from European funding that enabled the 7stanes mountain bike project to become a reality. Local investment in new assets continues to build on that. We firmly believe that budgets would be better invested in new assets like extending dark sky status, which would have a wide-reaching benefit to many, rather than geographically ringfencing a large swathe of landmass and marketing it under one brand, limiting investment and stifling opportunity.

Halo Effects – *Newcastleton has stated that it does not wish to be included within the proposed geographic boundary of the park* however, we would benefit from the claimed halo effects if they materialise, but we suspect they won't.

Attraction for Businesses – those already trading within the proposed boundary may be happy to accept the park and its constraints, even though the planning function is to remain with the local authority, but presumably the national park will become a statutory consultee? It will still have the right to impose a view on any major development projects. This can only constrain likely investment not encourage it.

Housing issues – the report highlights a growth in the value of property by some 20%+ on current housing values as a positive. The complete lack of impact from this on local wages and home ownership is breath taking in its arrogance and assumption that this is a benefit to all. Our community, along with many other rural remote communities in the Scottish Borders, is struggling to keep our young people. Imposing barriers to home ownership – which is one of the attractions to make them stay currently – cannot be countenanced.

Bringing R100 to every home is estimated to add 10/15% in terms of monetary value (although this will diminish when everybody has digital connections), and likely to have far bigger economic impact than the national park to the Scottish Borders. Budget needs to be directed to address this issue so that new enterprises can be encouraged and remote rural locations like Newcastleton can attract new 'home business' markets which will add real benefit to our local economy. Increasing the cost of entry to owning a house locally by 20% only benefits the current homeowner, it takes no account of the next generation of homeowners which we are striving hard to retain.

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In conclusion NDCC continues to object to the proposed National Park in the very strongest terms.

Newcastleton does not wish to be included in any park boundary which has the potential to constrain us and stop us delivering our ambitions for the community. We firmly believe that the park will slow investment and development and we cannot afford for either to be a factor in our future.

As a community we fully endorse the community empowerment act legislated in 2015 and are actively seeking ways we can plan a sustainable future to protect the lifestyle we all choose to live. We want nothing to stop us achieving that and believe the National Park will stop us, even if it borders our boundary.

Scottish Government Comment

NDCC is reassured that the Scot Gov has no heart to support any change from the current status quo.

An article published recently in the NFU newsletter Michelle Ballantyne, Conservative MSP for South Scotland, asked what its position is on the creation of a national park in the Scottish Borders.

Answered by Mairi Gougeon MSP, Minister for Rural Affairs and the Natural Environment (30/08/2018):

We will continue our work to protect and enhance the natural beauty of the Scottish Borders, while promoting sustainable and inclusive economic growth. The region is already home to several designated areas, including a National Nature Reserve, several Sites of Special Scientific Interest and Special Areas of Conservation. There are no current plans to designate new national parks in Scotland. This would have major cost implications and present several complex administrative challenges for local and central government, as well as the communities the national parks would serve.

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