

**Consultation Title: Scottish Borders Local Development Plan 2
Main Issues Report**

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Scottish Land & Estates (SLE) is a member organisation that uniquely represents the interests of both land managers and land-based businesses in rural Scotland. SLE has members with interests in a great variety of land uses and welcomes the opportunity to respond to this consultation.

Vision, aims and special strategy

1. Do you agree with the main aims of the LDP2? Do you have any alternative or additional aims?

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 your economy

2. Do you agree with the preferred option to retain the existing ‘Strategic High Amenity’ site categorisation and amalgamate the remaining categories? Do you agree with any of the alternative options including to retain the current policy position? Or do you have another alternative

option?

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.

3. Do you think there are settlements in which new or more businesses and industrial land should be allocated, and if so where?

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

4. Do you have any suggestions for a potential area of land to be allocated in the vicinity of Town Yetholm, Lauder and Kelso for business use, and if so where?

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

5. Have you any suggestions as to how allocated business and industrial land can be delivered more 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.

6. Do you agree with the preferred options for the provision of additional business and industrial land/mixed used land in the LDP2? Do you agree with the alternative option for mixed use land? Or do you have other alternative options?

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

Planning for housing

7. Do you agree with the preferred options for additional housing sites? Do you agree with the alternative options? Do you have other alternative options?

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

8. Do you agree with the preferred option for addressing proposals for housing in the countryside? Do you agree with the alternative proposal? Have you any other options which you feel would be more appropriate?

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.

- 9. Do you agree with the proposed existing housing allocations to be removed from the LDP? Are there any other sites you suggest should be deallocated?**

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.

Town centres

- 10. Do you agree with the preferred option? If so, which other uses do you think could be allowed within Core Activity Areas? Do you think existing Core Activity Areas within town centres should be reduced in size, and if so where? Do you think Core Activity Areas should be removed altogether?**

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.

- 11. Can you suggest any site options within Central Berwickshire, preferably Duns, to accommodate a new supermarket?**

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

- 12. Do you feel the requirement for Developer Contributions could be removed in some parts of town centre Core Activity Areas?**

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

- 13. Do you support the preferred option? Are there any other matters relating to sustainability and climate change adaptation which should be addressed? Do you have an alternative option?**

We consider this to be agreeable.

- 14. Do you support the designation of a National Park within the Scottish Borders? If so, which general area do you think a National Park should cover?**

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).

Regeneration

15. Do you agree with the proposed redevelopment sites to be allocated within the LDP2? Are there other sites within the Scottish Borders you feel should be included?

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

Settlement maps

16. Do you support the principle of Oxnam becoming a recognised settlement within the LDP? Do you agree with the proposed settlement plan and its boundaries?

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

17. Do you support the removal of the Core Frontage designation within Newcastleton Conservation Area?

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

Planning policy issues

18. Do you agree with the suggested policy amendments identified in Appendix 3? Do you think there are any other policy amendments which should be referred to?

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

Any other comments

19. Are there any other main issues which you feel should be addressed within LDP2? Please confirm these and explain how these could be addressed.

None.