## **Bell, Laura (Planning HQ)**

From:

**Sent:** 27 January 2019 20:25

To: localplan

**Subject:** LDP2 Main Issues Report - Consultation Response

**Attachments:** SBC-MIR-2018-Response.doc

Follow Up Flag: Follow up Flag Status: Completed

Dear Sir / Madam

# Response to Main Issues Report Consultation by Campaign for Borders Rail

Please find attached comments by Campaign for Borders Rail on the current consultation regarding the Main Issues Report for LDP2.

Yours faithfully

on behalf of Campaign for Borders Rail

# SCOTTISH BORDERS LOCAL DEVELOPMENT PLAN 2 – MAIN ISSUES REPORT CONSULTATION RESPONSE BY CAMPAIGN FOR BORDERS RAIL (CBR)

CBR is pleased to note that paragraphs 2.11 and 2.21 of the Main Issues Report (MIR) confirm that SBC continues to support extension of the Borders Railway (in line with SESPlan SDP policies).

#### Question 1 – Do you agree with the main aims of the LDP2

#### **Response:**

**Aims – Growing Our Economy** – para 3.2: "Improvements to the road network and public transport must continue to be supported". Comment: Add "in particular to ensure that the existing Borders Railway and its future extension can make an increasing contribution to the growth of the economy, and can encourage modal shift to reduce reliance on the private car".

Aims – Sustainability and Climate Change - para 3.7: "There is a continuing need to reduce travel" Comment: It is not realistic to seek to suppress travel demand, particularly when efforts are being made to grow the economy. Para 7.3 in the Sustainability and Climate Change section clarifies that the aim is to "reduce the need to travel by car". Para 3.7 should be amended to clarify that development should be controlled in such a way as to avoid encouraging additional travel, and also to encourage a shift to more sustainable transport modes, in particular by further exploiting the benefits of the Borders Railway.

**Growing Our Economy** CBR notes that the council's existing strategy supports making the most of economic development opportunities afforded by the Borders Railway. This principle should run through and be reflected by the housing, economic development, sustainability and regeneration policies of the LDP2.

#### **Delivering Sustainability and Climate Change Agenda**

#### Question 13 - Do you support the preferred option?

Para 7.3 makes reference to the need to encourage more low carbon transport choices and that developments should include clear and direct links to public transport nodes, but under 'Main Issues' there is no reference to transport policy as a key element in delivering greater sustainability. This omission should be rectified, and the need to promote use of public transport and the development of the Borders Railway should be stressed as a key part of the Preferred Option.

### **Planning Policy Issues**

#### **Question 18**

### Do you agree with the suggested policy amendments identified in Appendix 3?

When the current LDP was being prepared, the Campaign for Borders Rail argued that the LDP should give proper effect to the SDP policy and the council's own policy of extending the Borders Railway to Hawick and Carlisle, by including policies to prevent development which could undermine or run counter to that policy, for example by creating a physical obstruction to the route of the railway. In particular CBR argued that extension of the rail route should be highlighted in the Settlement Maps, in order that any prospective developer would be aware of the presumption

against developments which might hinder the railway extension. These representations by CBR were not accepted, but they are reiterated again here for further consideration. In particular, and notwithstanding the fact that the eventual route of the railway extension has yet to be decided, it is submitted that the LDP2 and all Settlement Maps should stress that no development will be permitted which would obstruct or be located unduly close to the line of the former railway from Tweedbank to Carlisle, as in most cases it is probable that this route will be used for the railway extension.

28th January 2019