

31 January 2019

Planning Policy & Access Team
Scottish Borders Council

Via email to:
localplan@scotborders.gov.uk

Young Planning & Energy Consenting
Suite 29
196 Rose Street
Edinburgh
EH2 4AT

Dear Sir/Madam

SCOTTISH BORDERS COUNCIL LOCAL DEVELOPMENT PLAN 2: RESPONSE TO MAIN ISSUES REPORT (MIR) ON BEHALF OF [REDACTED]

We act on behalf of [REDACTED] on whose behalf we are pleased to engage in the preparation of Scottish Borders Council's (SBC's) Local Development Plan (LDP) 2.

Background

[REDACTED] manages [REDACTED] with the objective of maintaining, preserving and improving the harbour for the benefit of stakeholders and the local community, whilst creating locally and regionally important socio-economic legacies.

[REDACTED] is currently exploring opportunities associated with the offshore renewables industry and is engaged in an ongoing commercial process with an offshore wind farm developer, with potential for [REDACTED] to act as an operations and maintenance base throughout the operational phase of the wind farm development. Linked to this potential opportunity, which would generate locally and regionally significant investment in Eyemouth, [REDACTED] recently secured planning permission for a helicopter access facility at adjacent land at Gungreen, and is engaged in pre-application discussions with SBC in respect of other development proposals associated with the potential operations and maintenance role.

Part 1: Context, Vision, Aims and Spatial Strategy

The MIR/emerging LDP2 are considered in the context of "Infrastructure, Transport and Sustainability" in paragraphs 2.6-2.15. This summary omits reference to two industries of strategic significance to the Scottish Borders given its location: (i) the emerging offshore renewables industry; and (ii) coastal industry, ports and harbours.

These omissions are reflected in SBC's consideration of the aims of the MIR/emerging LDP2, specifically:

- In paragraph 3.2 "Growing our economy", there is no reference to the potential for economic development opportunities associated with the emerging offshore renewables industry; and
- In paragraphs 3.2 and 3.5, "Growing our economy" and "Rural environment", respectively, there are no references to the significance of the Scottish Borders coastal economy. Indeed, reference to the rural environment/rural economy can be found throughout the MIR, while references to the coastal economy are absent.

These omissions are reflected in the scarce reference to [REDACTED] throughout the MIR, references being limited to a single mention of the location in the context of the fisheries industry and tourism, which combined are only part of [REDACTED] potential from economic development and economic growth perspectives. Reference to [REDACTED] as a location of

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local and regional significance to a range of industries, potentially including the offshore renewables sector, is similarly absent.

Such omissions are reflected in the absence of associated references within the summary of main aims provided at paragraph 3.8 of the MIR.

As such, in response to *Question 1 (Do you agree with the main aims of the LDP2? Do you have any alternative or additional aims?)*, [REDACTED] respond as follows:

[REDACTED] does not disagree with the Vision as stated within the MIR, nor to the inclusion of any specific aim. It does however consider there to be significant omissions and suggests the following additions:

- i. A new sentence should be inserted within existing paragraph 3.2, under the existing heading “Growing our economy”, as follows: “Further, the LDP2 should facilitate development associated with the growing offshore renewables industry, in particular that which is dependent upon the strategic significance of the Scottish Borders’ ports and harbours, and which contributes positively towards the economic development of such coastal locations.”
- ii. Amend the “Rural environment” heading to “Rural and coastal environment” and include within paragraph 3.5 the following sentence: “Reflecting the strategic significance of the Scottish Borders coastal towns, the LDP will support appropriate development in coastal locations including at and surrounding [REDACTED], which promotes economic development opportunities whilst continuing to safeguard the coastal environmental”;
- iii. At paragraph 3.8, under the “Growing economy” heading, include:
 - “Promote economic development opportunities at ports, harbours and other coastal locations, including those related to the offshore renewables industry.”
- iv. In the spatial strategy as it relates to the [REDACTED], amend the penultimate sentence in respect of [REDACTED] to read: “It continues to function as a working fishing port with an important tourism role, with potential for growth and diversification linked to the offshore renewables industry, as well as other complementary industries. Such growth and diversification could benefit from the extant planning permission for a helicopter access facility adjacent to [REDACTED].”

Part 2: Offshore renewables-related economic development opportunities in coastal locations, including [REDACTED]

The omissions referenced within Part 1 of this submission are reflected in MIR Section 4: Growing our economy. In general terms Section 4 fails to address the needs of emerging industries and the associated economic growth and development opportunities, for example the opportunities for coastal locations such as Eyemouth, associated with the emerging offshore renewables industry.

Linked to the suggested inclusion of an additional bullet point at paragraph 3.8 (see addition iii, in part 1 of this submission), (and therefore in part-response to *Question 1 (Do you agree with the main aims of the LDP2? Do you have any alternative or additional aims?)*) [REDACTED] recommends the inclusion of a new paragraph within the MIR sub-section (paragraph 4.12-4.15), covering the promotion of economic development opportunities at ports, harbours and other coastal locations. In relation to the offshore renewables-related opportunities at [REDACTED], that paragraph should include the following sentence: “...Land at and surrounding [REDACTED] should be promoted for a mix of employment generating uses, including complementary ancillary uses such as the approved helicopter access facility, which promote the potential role of [REDACTED] in supporting the offshore renewables industry...”.

In response to *Question 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*

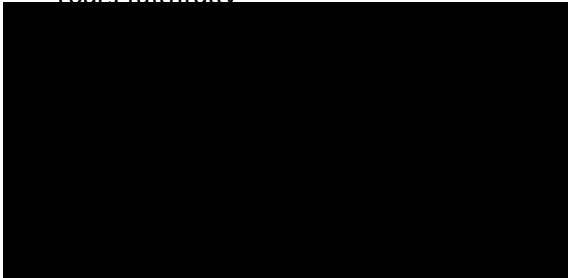
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another alternative option?), whilst reserving a position in respect of the identification of a preferred option, [REDACTED] support the need for flexibility within allocations relating to strategically important economic development areas (such as the Gungreen allocation near [REDACTED]), particularly in relation to some forms of sui generis uses and/or uses complementary to wider Class 4/5/6 development.

By contrast, the adoption of a sequential approach would not necessarily encourage complementary uses and could result in overly restrictive allocations which do not meet industry requirements. For example, the recently approved helicopter access facility significantly complements [REDACTED] wider offering as a potential O&M base for an offshore wind farm. It is unclear how such a new policy approach (i.e. including the sequential element) could facilitate such a sui generis use without an element of flexibility afforded by the existing policy designation and associated development brief.

[REDACTED] would welcome further discussions on these representations and trust they will be taken into account in SBC's drafting of the Proposed Plan.

Yours faithfully



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cc [REDACTED]