

## Response ID ANON-7TG7-FA4Y-W

Submitted to **LDP2 - Main Issues Report**

Submitted on **2019-01-31 14:25:18**

### Data protection

#### About you

Are you responding as an: individual, organisation, or an agent acting on behalf of a client?

Organisation

#### Organisation

If you are responding as a representative of a group or organisation, please provide details below:

**Organisation:**

Borders Network of Conservation Groups

**Name:**

██████████

**Job title:**

██████

**Address line 1:**

██████████████████

**Address line 2:**

**Address line 3:**

**Town/city:**

██████

**Postcode:**

██████████

**Contact number:**

**Email address:**

██████████████████████████████

### Vision aims and spatial strategy

#### Question 1

**Q1 Agree aims LDP2:**

Broadly, yes, but there seems to be little ambition to pro-actively develop Conservation of the Borders' landscapes and to promote initiatives based on the value of those assets.

### Growing our economy

#### Question 2

**Q2:**

**Q2 upload:**

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#### Question 3

**Settlement business allocated:**

**Upload Q3:**

No file was uploaded

#### Question 4

## **Business Use Towns:**

### **Upload Q4:**

No file was uploaded

### **Question 5**

#### **Land delivery effectively:**

### **Question 6**

#### **Agree?:**

### **Upload Q6:**

No file was uploaded

## **Planning for housing**

### **Question 7**

#### **Housing agree?:**

### **Upload Q7:**

No file was uploaded

### **Question 8**

#### **Housing countryside:**

### **Upload Q8:**

No file was uploaded

### **Question 9**

#### **Agree removed housing :**

## **Supporting our town centres**

### **Question 10**

#### **Core Activity Areas:**

### **Question 11**

#### **Berwickshire supermarket:**

### **Upload Q11:**

No file was uploaded

### **Question 12**

#### **Develp contrib town:**

## **Delivering sustainability and climate change agenda**

### **Question 13**

#### **Support alternative option:**

Scottish Borders Council has a duty to reflect UK Government policy in its development plan, where it refers to reserved matters. Energy is a matter reserved to the UK Government. Scottish Government's 'national policy imperative' to develop renewable electricity has moved from being a 'target' to 'not a cap' to 'ambitions', which are limitless. The same cannot be said of the capacity of the landscape to accommodate wind turbines.

The Borders Network of Conservation Groups welcomes Scottish Borders Council's Supplementary Guidance (SG) on Renewable Energy, based on the updated Ironside Farrar Landscape Capacity and Cumulative Impact Study 2016 which has defined the capacity of the Scottish Borders landscapes in terms of wind farm development. It is obvious that although wind turbines may increase in size in response to changing financial feasibility, the receiving landscape, together with its capacity to accommodate wind turbines, will remain the same. Issues of scale are now critical.

We therefore strongly suggest that there should be no implication within the LDP that wind farms with turbines of heights of 149.9m are now considered to be normal. We appreciate that anticipated future applications from wind farm developers may well seek wind turbines in excess of 200m in height but that does not make, or even contribute to making, 100-250m acceptable. The language in the MIR seems to suggest that Scottish Borders Council accepts that developers

need larger wind turbines to make their desired profits in the absence of a subsidy régime, and that this can justify damage to landscapes where such large turbines cannot be accommodated. As a planning authority would the Council give permission to demolish the centre of Duns to clear a site for a new supermarket on the grounds that it would be more profitable than the existing food shops?

We are particularly concerned that the requirement for Aviation safety lighting for towers and turbines in excess of 150m in height will bring a proliferation of polluting, high-intensity red lights, widely-visible across the night sky across the Borders. Unlike the Selkirk (238.8m) and Ashkirk (229.1m) comms masts where the lights are static and constant, the movement of blades passing across the lights on turbine towers will give the effect of rapid flashing. Mitigation by Radar-Activated Lighting will lead to lights switching on and off at random from dusk to dawn. This would appear to jeopardise any future consideration by SBC of the promotion of dark skies in order to help tourism. In the interim, we suggest policy should therefore presume against development proposals which produce levels of lighting which may impact on dark skies.

Impacts of wind farm development of such gross size are not restricted to landscape and visual effects. The recently-consented Pines Burn wind farm has permitted the construction of turbines of 130m and 149.9m within 1300 metres of residential properties. If consented, Barrel Law (currently at Appeal) would have 132m turbines standing within 1230m of someone's home. In both cases, micro-siting could bring the turbines closer still. This cannot be considered acceptable. A 2km separation distance from dwellings was recommended when turbine heights of 100m were considered to be very large. The separation distance should be increased to protect residential amenity.

In addition, the 'need' argument for renewable energy to meet Scotland's gross electricity requirement by 2030 becomes increasingly weak and should be given less weight in the planning balance as that requirement is now very close to being met. As energy consumption is falling, it is perverse to argue that more energy will be required to supply future needs.

Consented renewable energy (installed MW) now exceeds Scotland's total gross electricity requirement of around 12.2 GW by 161%. The most recently-published DUKES database:

<https://www.gov.uk/government/publications/renewable-energy-planning-database-monthly-extract> (January 15th 2019 )

gives a figure of 19.672 GW installed capacity already-consented in Scotland from all types of renewable energy generation. Of this, just over 11.062 GW is currently operational or under construction, and 8.6 GW is awaiting construction. A further 6.667 GW awaits determination in Planning. It is clear that Scotland's needs will be met almost twice over if even half of the renewable energy generation schemes currently in the Planning pipeline are consented.

Finally, in answer to Scottish Borders' concerns about climate change issues and adaption in order to seek a low carbon economy we welcome the opportunity to present this recent paper from BNCG's Vice-Chair Professor ██████████, FREng (from January 2019) by which puts Scotland's and the SBC area's contribution to Greenhouse Gas emissions and and Climate Change into perspective:

"Estimating Scotland's Contribution to Climate Change

Global greenhouse gas emissions in 2017 were 32,500Mte (million tonnes). Britain's were 375Mte and Scotland's about 10% of these. Thus Scotland contributes about 0.113% of the global total. What is this likely to mean in terms of a contribution to increased global temperatures, and so how much could Scotland's 'decarbonisation' contribute to climate change amelioration?

"The UN climate model which predicts end of century temperature rises of up to 4°C has in practice been found to be rather poor when its short term predictions are tested against observed changes. Danish statistician and environmentalist Bjørn Lomborg has used it, not to predict absolute temperature changes, but relative changes resulting only from changes in carbon dioxide emissions. These should be more reliable as this effect is believed to be better understood than many other factors such as cloud cover.

"Specifically, Lomborg has used the model to estimate the impact of having all the signatories to the much-vaunted Paris climate agreement fulfil their (non-binding) commitments by 2030 and continue to honour them until the end of the century. The model predicts that the reduction in whatever temperature rise would otherwise have occurred would be a mere 0.17°C.

"The impact of all the EU commitments, including Britain's, would be 0.053°C. Britain's share of EU emissions in 2017 was 11.2%, so it seems reasonable to pro rata this temperature reduction, making our national contribution to saving the planet 0.00594°C. The UK commitment is to an 80% reduction in in emissions so if 100% reduction were possible this would increase the amelioration to 0.00742°C.

"So what of Scotland? Since our emissions are about 10% of the UK's, we are responsible for around 0.000742°C of whatever temperature rise may occur by the end of the century. This is the amount by which complete elimination of all our greenhouse gas emissions from all sources could reduce the postulated increase in global temperature. It is also an amount which is so small as to be literally unmeasurable.

"Sources

<https://www.iea.org/publications/freepublications/publication/GECO2017.pdf>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/695930/2017\\_Provisional\\_Emissions\\_statistics\\_2.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/695930/2017_Provisional_Emissions_statistics_2.pdf)

<https://www.lomborg.com/press-release-research-reveals-negligible-impact-of-paris-climate-promises>

<https://ec.europa.eu/eurostat/documents/2995521/8869789/8-04052018-BP-EN.pdf/e7891594-5ee1-4cb0-a530-c4a631efec19>"

## Question 14

### National park:

BNCG is concerned to promote the appreciation and protection of the unique and beautiful landscapes and amenity of the Scottish Borders and we enthusiastically support the designation of a National Park in the Borders. The potential for the Scottish Borders to be marketed as a tourist destination in this way is vast. The landscape in the Borders is our greatest asset in terms of developing a vibrant tourism economy, creating sustainable jobs, and tapping enormous

potential to attract the urban populations of cities in Scotland's Central Belt, Newcastle, Carlisle and beyond. Yet, compared to the Highlands and Islands for instance, very few people outside Scotland (and quite possibly within Scotland too) know anything about the much more easily accessible Scottish Borders, let alone consider it as a visitor destination. The instantly and internationally recognized National Park brand could reverse this virtually overnight, at no expense to the Council, and, in the long term, at net profit to the Scottish Government. Since the Park would be wholly contained within one local authority area (unlike the two existing Scottish Parks) there would not even be a need for any additional bureaucracy as far as planning is concerned.

It would make sense for the Scottish Borders to march with the Northumberland National Park, and we agree it should be broadly based on the Cheviot Hills and Roxburghshire.

**Upload Q14:**

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**Regeneration**

**Question 15**

**Agree redevelopment:**

**Upload Q15:**

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**Settlement Map**

**Question 16**

**Oxnam settlement:**

**Question 17**

**Core frontage Newcastleton:**

**Planning policy issues**

**Question 18**

**Agree amendments appendix3:**

**Any other comments**

**Question 19**

**Other main issues:**

**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.:**