

Response ID ANON-7TG7-FA7U-V

Submitted to **LDP2 - Main Issues Report**

Submitted on **2019-01-31 14:37:18**

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:

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Vision aims and spatial strategy

Question 1

Q1 Agree aims LDP2:

Section 2.15 We support the Council's ambitions for delivering sustainable development and a low-carbon future. The protection of "natural intrinsic qualities" should place emphasis on natural, indigenous habitats and species (ie, not commercial conifer plantations or introduced, non-native plant and animal species, even when these are perceived to be part of the natural biodiversity or have some nominal aesthetic value to some people).

Section 2.21 We support the ambitions for an extension of the Borders railway to Carlisle and the provision of a new station at Reston to service the east-coast line. Rail travel can make a major contribution to the low-carbon economy by providing an alternative to road travel and reducing the number of vehicles.

Growing our economy

Question 2

Q2:

Q2 upload:

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Question 3

Settlement business allocated:

Section 3.6 The built and natural heritage should be considered separately if either is to be effectively addressed and given the attention and support that they deserve in terms of fulfilling the recognition of their importance in the “attractiveness” of the Scottish Borders.

Section 3.7 Sustainability and climate change. We support the Council's ambitions in this regard. The use of small- or domestic-scale renewable energy generation (wind, hydro, solar) should be included in any energy strategy, and not just left to the large, commercial wind farms. (The latter should also be included, of course, but not solely.) All new build should be required to incorporate energy-generation facilities and the highest standards of thermal insulation.

Section 3.8 The development of brownfield sites should be undertaken only if appropriate ecological surveys have been carried out. Brownfield sites, especially those which have been undisturbed for a long time, often support rare and localised species that are not found in other habitats and contribute to the region's biodiversity richness. Brownfield sites can also, in general, be more important for wildlife than much of what is perceived to be 'unspoilt' Borders countryside which has, in fact been transformed by agriculture and forestry to the extent that large areas are now of very limited ecological value.

Business and Industrial Land

No development should take place on flood plains or anywhere that would require the modification or realignment of water courses or the provision of flood defences, or involve the destruction of any wetland habitat or feature (eg, marsh, bog, wet grassland). Historically, the Borders has seen extensive commercial and domestic development on riversides, a response to the need for water power for the mills. This has left a legacy of unsustainable and expensive measures required to keep these premises and properties protected from flooding. There is no justification for such an approach nowadays. Rather than continuing to build in flood-prone areas, and defending these at unacceptable financial and ecological cost, managed retreat of settlements and infrastructure should be embarked upon to address maladaptive development along watercourses. Such an approach will contribute hugely to flood management and remove the need for expensive flood-protection measures. If SEPA objects to developments (such as that at Eildon, Selkirk) there should be no attempt by the Council to progress the proposal.

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

Develop contrib town:

Delivering sustainability and climate change agenda

Question 13

Support alternative option:

Section 7.8 The Borders Land Use Strategy should be used not just as a tool or guide in terms of biodiversity, but across the full suite of landuse options, such as forestry, building development, and recreation, inter alia. It is an extremely valuable, comprehensive and almost unique (in Scotland) exercise that has identified appropriate use of land for the region and should be the “go to” document for any operation that involves potential land use change. It should also be used to identify existing operations that are inappropriate in certain areas (such as buildings on flood plains, and commercial forestry and intensive agriculture [including sheep grazing] in sensitive water catchments) and seek to remove these or, at least, stop their expansion and deleterious impacts.

Section 7.9 Although “woodlands” and “forestry” are mentioned as discrete entities, the use of “woodlands” to describe all trees is used more commonly in the document. There should be a clear distinction between “woodlands” as native broad-leaf species of some commercial value but also of considerable ecological, aesthetic and recreational value; and “forestry” which is commercial conifer plantations, often near-monocultures, and of very limited ecological value. The two should not be conflated.

Section 7.11 Flood risk can be avoided in new developments by the simple expedient of not building in flood-prone areas. The presence of existing buildings in such areas, or flood prevention defences/structures, should not alter this approach.

Section 7.13 As noted in 7.11 (above) and under Q3, there should be no place for development where mitigation is required and where SEPA have expressed concerns. The cost of flood defences adds to the cost of the development, and defences against a 1 in 75 flood event might well become obsolete in a relatively short time as the climate changes. In which case, further expense is then required to bolster the flood defences and salvage those new developments (or new relative to the historic mills) in flood-prone areas which should not have been built in the first place.

Question 14

National park:

Section 7.14 Borders National Park

From the ecological and nature conservation perspective (eg, presence of significant wildlife species or populations of species, habitats or ecological processes) the creation of a national park in the Borders could not be justified. There are other parts of Scotland where such a designation would be significantly more valuable and warranted in terms of biodiversity interest and nature conservation.

Upload Q14:

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Regeneration

Question 15

Agree redevelopment:

Brownfield sites, when suitably restored and managed, can be of more value to the public as open space in urban areas. As such, they can provide a setting for community enjoyment and a “breathing space”, rather than developments that might have limited benefit and seriously detract from the ambience and social value of an urban area. Consider, for example, how much more valuable to the general community are, for example, the town-centre public gardens in Galashiels or Wilton Lodge Park in Hawick, as open space than if they were built upon.

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.: