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Submitted to LDP2 - Main Issues Report

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Data protection

About you

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

[REDACTED]

Organisation

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

Organisation:

[REDACTED]

Name:

[REDACTED]

Job title:

[REDACTED]

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

Town/city:

[REDACTED]

Postcode:

[REDACTED]

Contact number:

[REDACTED]

Email address:

[REDACTED]

Vision aims and spatial strategy

Question 1

Q1 Agree aims LDP2:

As far as the Built and Natural Heritage aim is concerned we would suggest that the way this is worded is not so much an aim, more a continuation of business as usual. In public service language an aim must seek to take us from where we are now to some better place, or a better position. To be part of a development plan this particular aim should therefore seek to develop and advance the protection and enhancement of our rich built and natural heritage. There are clearly several ways to do this but we would argue that the best way, the cheapest way for the Scottish Borders, the one which has most evidence to back up that claim, and the one with considerable popular support, is to have a significant part of the Scottish Borders designated as a National Park.

Growing our economy

Question 2

Q2:

Q2 upload:

No file was uploaded

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:**

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Question 12**Develop contrib town:****Delivering sustainability and climate change agenda****Question 13****Support alternative option:**

The first sentence of para 7.17 states: "The Council will continue to follow national guidance and policy in taking appropriate measures to address climate change issues". Most rational thinkers would agree that one of the meanings of 'appropriate' in this context is 'proportionate'.

Global greenhouse gas emissions in 2017 were 32,500Mte (million tonnes). Britain's were 375Mte and Scotland's about 10% of these. Thus Scotland, as [REDACTED] has pointed out in a recent article in The Times, contributes about 0.113% of the global total. What this is likely to mean in terms of a contribution to increased global temperatures, and how much (or actually how little) Scotland's 'decarbonisation' could contribute to climate change amelioration is further detailed by Professor Ponton below.

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 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.

Jack Ponton, FREng, January 2019

Sources

<https://www.iaea.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://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>

This even-handed assessment means that the construction of any further giant, industrial-scale wind farms in the Scottish Borders will not be proportionate to the disbenefits of their impact on quality of residential life, landscape and visual amenity, as well as the ecology and environment of the Borders. We are much more likely to make inroads into ameliorating climate change through reducing energy consumption. It follows that all of our efforts should go into the latter.

Within para 7.18 are the following sentences: "With the loss of feed in tariffs and grant aid it is inevitable that in order to increase efficiency and financial viability wind turbines will be manufactured to greater heights. It is anticipated planning applications for turbines up to and exceeding 200m will soon be submitted". While this may be factually correct in describing the likely intentions of wind energy developers, the assertion of inevitability could be deemed to be accepting that these larger turbines will have to be considered on the grounds of efficiency and financial viability. That would of course be misleading so we suggest different wording is used.

We also suggest that, where the Council makes it clear that it must continue to judge applications against its landscape capacity and cumulative impact study, it should point out that the physical forms of a landscape, barring earthquakes or volcanic eruptions, are unlikely to change, and that therefore assessed capacity in 2016 remains valid and absolute, rather than relative to the increasing size of the turbines in applications. Landscape capacity does not change because financial feasibility is less favourable to developers.

No government would allow electric vehicles to be governed by higher speed limits than other vehicles if manufacturers were to claim that this was the only way to increase electric vehicle use while being economically viable. That would be no different from a planning authority granting permission for large turbines in a landscape that did not have the capacity to contain them, while citing one of the reasons as the fact that smaller turbines would not be economically viable.

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. In the House of Commons recently our MP John Lamont noted concerns over the number of large wind farms in the Scottish Borders, before seeking an assurance that 'industrial' onshore wind would not be promoted by the UK Government over other forms of renewable energy which have less impact on local communities.

During Questions to the Secretary of State for Business, Energy and Industrial Strategy, Mr Lamont said: "I very much support renewable energy but many of my constituents in the Scottish Borders feel we have our fair share of onshore wind."

"So can the Minister assure me that nothing in Government policy will promote onshore wind farm development over other forms of renewable energy?"

In response, Minister for Clean Energy, Claire Perry MP responded: "That is exactly the point of technology neutrality," referring to the UK Government policy that as many forms of renewable energy as possible should be allowed to bid for Government support to avoid supporting one type of energy over another.

It is suggested that the Sustainability and Climate Change aim should make reference to technology neutrality in terms which show that SBC is not favouring one type of energy over another.

Question 14

National park:

Unsurprisingly we strongly support the designation of a National Park within the Scottish Borders, for all the reasons that the Campaign has already given.

The following documents have previously been provided to Scottish Borders Council and can be accessed by anyone at http://www.borders-national-park.scot/feasibility_study.htm .

Independent Feasibility Study

Campaign Position Statement in response to the above

Economic Impact Study.

We believe that the area of the former county of Roxburgh, more or less, would readily meet the criteria for national parks, as well as providing a proven means of boosting economic development in a part of the Borders which has suffered economically for many years.

We suggest that there is a coherent, layered cultural heritage and history stretching from the Cheviot Hills, down through glens, woods and farmland to the Tweed, from ancient history (the Southern Borders has more hill-top forts than any other part of the UK); through medieval times when the four abbeys built their fortunes on international trade in wool from their huge flocks of sheep grazing pastures from the Merse right up to the foothills of the Cheviots; and through the Borders reivers who rivalled each other in their exploits and made much of the land ungovernable for a period. Not only is the landscape rich in history, that history is visible today in the built heritage and landforms, and celebrated by all age groups in the Borders to an extent seldom seen elsewhere in the UK, for instance through the common ridings and similar festivals.

It is a widely acknowledged effect of national park designation across the world that the towns and service providers just outside the boundary of a national park benefit economically as much if not more from that designation as do the settlements and businesses within the boundaries, through what is known as the 'halo effect'. Hence a 'Scottish Borders National Park' based on Roxburghshire would be highly likely to benefit all of the Scottish Borders.

We suggest that the question of whether towns close to the edge of the eventual National Park area should be inside or outside the NP boundary should be left for those towns themselves to decide, eg through the relevant community councils and SBC councillors. For instance, if Roxburghshire were settled upon, the towns of Hawick, Melrose and Kelso should be allowed to determine whether they are located inside or outside the boundary.

Whatever the case, each of these towns, and also Galashiels because of its situation on one of the main roads and the rail route heading towards the proposed Park area from the north, would inevitably become 'Gateway Towns' benefitting from the halo effect. It is equally likely that Earlston, even if not within the Park area, would benefit from southbound traffic towards the Park, just as Coldstream could benefit from traffic heading from the east.

We also suggest that the Main Issues Report consultation should not be the only means by which the Council assesses the NP proposal. Since a principle driver would be economic regeneration it will be necessary for the Council to consider how to adequately assess the economic benefits predicted, as well as any other economic impact.

Upload Q14:

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Regeneration

Question 15

Agree redevelopment:

We agree with the proposed redevelopment sites and would suggest that the former primary school at Hobkirk should also be included.

Upload Q15:

No file was uploaded

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.: