

Issue 2.8	Key Areas of Change – Scottish Borders	
Development Plan reference:	The Spatial Strategy, Key Areas of Change Scottish Borders, pages 26 – 27, para 3.29 – 3.34	Reporter: [Note: For DPEA use only.]
Body or person(s) submitting a representation raising the issue (including reference number):		
Amber Real Estate (040040) Campaign for Borders Rail (039962) Cockburn Association (037249) Denholm and District Community Council (040612) Eyemouth Harbour Trust (031900) Mr Jon Grounsell (786916) Mr Kenneth Gunn (039664) H and H Group Plc (927998) Lammermuir Community Council (039856)	Mrs Mirabelle Maslin (928549) Mrs Joyce McLean (929018) Peebles Community Trust (810911) Rural Renaissance (039402) Scottish Environmental Protection Agency (790577) Scottish Wildlife Trust (038549) SP Energy Networks (034701) Mr Charles Strang (907037) Transform Scotland (039136)	
Provision of the Development Plan to which the issue relates:	The Spatial Strategy - Key Areas of Change and the Scottish Borders.	
Planning Authority's summary of the representation(s):		
<p><u>Amber Real Estate (040040)</u> Figure 3.5 should be modified to include Greenlaw as a Rural Growth Area.</p> <p><u>Campaign for Borders Rail (039962)</u> Supports the potential future expansion of the Borders Railway and calls for the Proposed Plan to make a clear directive to LDPs to safeguard land around the route for future expansion.</p> <p><u>Cockburn Association (037249)</u> Proposed Plan should reference proposal for a new National Park in the Scottish Borders as this would support economy and communities. Inappropriate wind farms may impact on rural economy. The Borders Railway should be extended as far as it is economical and practical to do so – this will provide opportunities for businesses and local communities.</p> <p><u>Denholm and District Community Council (040612)</u> Insufficient detail on improving transport networks over the plan period. Proposed Plan does not take into account potential for a Borders National Park. The Proposed Plan overlooks heritage and landscape assets of the Scottish Borders.</p> <p><u>Eyemouth Harbour Trust (031900)</u> A new station at Reston and dualling of the A1 will offer improved access to Eyemouth and support the potential growth opportunities in Eyemouth Harbour as</p>		

an operations and maintenance facility supporting marine energy projects in the Firth of Forth. These opportunities have been overlooked in the Proposed Plan. Coastal assets, specifically the port at Eyemouth, will need to evolve to meet requirements of marine energy sector.

Mr Jon Grounsell (786916)

Seeks that the possible extension of the Borders Railway be reconsidered and re-routed from Galashiels to Selkirk, then Hawick, then Jedburgh, Kelso, and finally Berwick Upon Tweed in order to promote inter-connectivity between Borders towns, rather than provide a link south to Carlisle. Representation also seeks that the Proposed Plan makes a commitment that this potential route is safeguarded.

Mr Kenneth Gunn (039664)

The spatial strategy does not give sufficient weight to Selkirk, nor the need for additional housing in Selkirk in order to prevent population and economic decline. Representation calls for investment in infrastructure, education and Selkirk town centre.

H and H Group Plc (927998)

Supports strong focus on rural growth in the Scottish Borders. Request that the area in and around Newtown St Boswells be highlighted as a 'Borders Rail Cluster' within Figure 3.5 to reflect the current and proposed Tweed Horizons Centre, The Council Headquarters and the regeneration plans for the Auction Mart lands. Critical that strategic business locations are provided in logical locations in order to assist in the overall financial viability of the extended railway.

Lammermuir Community Council (039856)

Supports the spatial strategy for Scottish Borders, in particular the planned new station at Reston which should be brought forward as a priority. This proposal should be brought forward in conjunction with a commitment to improve east west public transport links. Considers that Green Network Priority Areas do not go far enough and National Park status should be considered as a means to protect and preserve appropriate areas from Carter Bar to Lauderdale and The Lammermuirs.

Mrs Mirabelle Maslin (928549)

The plan should contain a commitment to increasing capacity of the Borders Railway and to increase parking facilities at stations.

Mrs Joyce McLean (929018)

Supports the re-opening of railway station at Reston as a priority; notes that Rural Areas, particularly the Eastern Borders, require support to encourage economic and tourist growth.

Peebles Community Trust (810911)

Under 3.29 would like to see explicit reference to improved east-west transport links and improved connectivity between Borders settlements as well as with Edinburgh.

Rural Renaissance (039402)

Beyond 2030 the Central Borders Strategic Growth Area should be maintained and

the Long Term Growth Corridor into the Borders should not stop at the Edinburgh boundary, but should extend the length of the Borders railway. Need to recognise that settlement boundaries will expand overtime and some greenfield development is inevitable. Allocations should be well related to transport corridors. Development principles should be modified to make a clear reference to a presumption in favour of sustainable development as outlined in SPP.

Scottish Environmental Protection Agency (790577)

Seeks that reference to any opportunities arising from major flood schemes makes clear that these opportunities should not increase numbers of people and property at risk from flooding.

Scottish Wildlife Trust (038549)

Proposed Plan does not give sufficient detail on biodiversity elements of Strategic Green Network Priority Areas (Key Areas of Change, Scottish Borders).

SP Energy Networks (034701)

Proposed Plan does not reflect the range of strategic infrastructure improvements that are likely to be required in the Scottish Borders during the plan period.

Mr Charles Strang (907037)

Supports the potential future expansion of the Borders Railway and calls for the Proposed Plan to promote this and also make a clear direction to safeguard land around the route for future expansion. Representation also seeks similar safeguarding of rail route from Tweedbank to Berwick.

Transform Scotland (039136)

Supports future extension of the Borders Railway to Hawick and beyond to restore a link south to Carlisle, but suggests this land should be safeguarded. Support is also noted for a new rail station at Reston on the East Coast Main Line.

Modifications sought by those submitting representations:

Amber Real Estate (040040)

Representation requests that Figure 3.5 is modified to include Greenlaw as a Rural Growth Area.

Campaign for Borders Rail (039962)

Representation seeks that paragraph 3.31 of the Proposed Plan is modified to add a clear requirement that LDPs protect the route of former Waverley railway to safeguard land for future expansion.

Cockburn Association (037249)

Add reference at Strategic Development Plan level (Key Areas of Change Scottish Borders, paras 3.29 – 3.34) to a new National Park in the Scottish Borders.

Denholm and District Community Council (040612)

No modification is specified, representation indicates that paragraph 3.34 be modified to include consideration to pursue National Park designation in Scottish Borders in addition to use of Strategic Green Network Priority Areas.

Eyemouth Harbour Trust (031900)

Amend first sentence of paragraph 3.33 to read:

‘On the East Coast Main Line, a new station at Reston will:

- i. provide settlements in Berwickshire with easier access to employment and education markets in Edinburgh;
- ii. improve access to Eyemouth, supporting potential growth opportunities including those relating to the provision of support to the offshore renewables sector; and
- iii. encourage more people to visit the area’. □

Include new paragraph 3.34: ‘Coastal locations, including Eyemouth Harbour, are ideally placed to support the offshore renewables industry. Development associated with the opportunity could deliver significant local and regional economic benefits’.

Mr Jon Grounell (786916)

Modify paragraph 3.31 and Figure 3.5 to re-route potential extension of Borders Railway from Galashiels to Selkirk, Hawick, Jedburgh, Kelso, and Berwick Upon Tweed. Add the requirement for this route to be safeguarded.

Mr Kenneth Gunn (039664)

No modification specified, representation indicates Proposed Plan’s spatial strategy should be altered to give greater strategic focus to Selkirk, including identifying additional housing, and increasing investment in infrastructure and education.

H and H Group Plc (927998)

Modify Figure 3.5 Scottish Borders to highlight the area in and around Newtown St Boswells as a ‘Borders Rail Cluster’.

Lammermuir Community Council (039856)

Modify paragraph 3.34 Key Areas of Change Scottish Borders to include consideration to pursue National Park status for key areas of Scottish Borders in addition to use of Strategic Green Network Priority Areas.

Mrs Mirabelle Maslin (928549)

Add requirement for the plan to contain a commitment to increasing track capacity of the Borders Railway and to increase parking facilities at stations.

Peebles Community Trust (810911)

Modify paragraph 3.29 to add specific reference to improving east-west transport links and improved connectivity between Borders settlements as well as with Edinburgh.

Rural Renaissance (039402)

Modify long term growth corridor from Edinburgh south to extend along the length of the Borders railway.

Scottish Environmental Protection Agency (790577)

Modify last sentence of paragraph 3.31 to read as follows: ‘Major flood schemes in

Selkirk, Hawick and Galashiels will also provide opportunities for growth and regeneration in the Central Borders. These opportunities should not increase the number of persons and property at risk of flooding’.

Scottish Wildlife Trust (038549)

Para 3.34 - add more detail regarding biodiversity elements of Strategic Green Network Priority Area identified in the Scottish Borders.

SP Energy Networks (034701)

Add new paragraph between paragraph 3.33 and 3.34 as follows: ‘Electricity transmission infrastructure in the Scottish Borders will require upgrading and improvement during the SESplan period. Depending upon the nature of electricity generation developments in the area, grid reinforcement works which fall within the scope of NPF3’s national development number 4 may also be forthcoming. The location and form of grid transmission projects will be defined by the operator’s requirements and should be supported through appropriate LDP policy’.

Mr Charles Strang (907037)

Modify paragraph 3.31 to add a clear requirement that the route of former Waverley railway to safeguard land for future expansion. Although not specified, representation indicates addition of route of Tweedbank to Berwick Railway to Figure 3.5 Scottish Borders.

Transform Scotland (039136)

Add safeguard status to land required for extension to Borders Railway to Hawick and south to Carlisle (paragraph 3.31). Paragraph should also be modified to encourage greater integration between local bus services and the Borders Railway.

Summary of responses (including reasons) by Planning Authority:

Borders National Park

Cockburn Association (037249), Denholm and District Community Council (040612), Lammermuir Community Council (039856)

Disagree with proposed modification to add strategic reference to a Borders National Park. A planning authority is given no role in the proposal of or creation of a National Park. The Scottish Ministers have the jurisdiction to propose, and to make a designation order for, a National Park following advice from Scottish Natural Heritage. It is not considered the role of SESplan and the SDP to confirm such designations. **No modification proposed.**

Borders Railway

Lammermuir Community Council (039856)

Representation notes support for the spatial strategy for Scottish Borders, in particular the planned new station at Reston which should be brought forward as a priority. This proposal should be brought forward in conjunction with a commitment to improve east west public transport links. SESplan notes the response, and the SDP includes the provision of a new station facility at Reston as a Strategic Transport Improvement Project. The comments on improving east west public transport provision have been noted. **No modification proposed.**

Rural Renaissance (039402)

Disagree with proposed modification. This is not considered appropriate given the limited amount of scope for creating additional housing or employment land between Edinburgh and Galashiels, with the exception of some limited land close to the rail station at Stow. Galashiels and Tweedbank are covered by the Strategic Growth Area, and the Rural Growth Area extends north to Stow, and south to Hawick to cover any future railway extension, therefore growth which can be created by the rail line is generally covered within SESplan. Furthermore, as set out in paragraph 5.8 of the Proposed Plan, current housing land estimates (Table 11.2 in Housing Background Paper ASD22) indicate that there is sufficient housing land supply to meeting the Scottish Borders Housing Land Requirement. Therefore it is currently estimated that the next Scottish Borders LDP will not be allocating additional housing land. **No modification proposed.**

Borders Railway – future expansion

Campaign for Borders Rail (039962), Cockburn Association (037249), Mr Jon Grounell (786916), Peebles Community Trust (810911), Mr Charles Strang (907037), Transform Scotland (039136)

Disagree with proposed modification. Transport Scotland is currently undertaking a Pre-Feasibility Transport Corridor Study which includes the proposal to extend the railway to Hawick and Carlisle, along with other potential rail and road improvement schemes. Transport Scotland has indicated that the reporting for this study will be towards the end of 2017. There is also a clear direction in the Proposed Plan which states 'Local Development Plans will safeguard land as necessary for strategic projects, including potential strategic cross-boundary projects and longer term projects. Local Development Plans will also safeguard land as necessary for local transport projects' (see paragraph 6.13). **No modification proposed.**

Mrs Mirabelle Maslin (928549)

Disagree with proposed modification. Transport Scotland is currently undertaking a Pre-Feasibility Transport Corridor Study which includes the proposal to extend the railway to Hawick and Carlisle, along with other potential rail and road improvement schemes. Transport Scotland has indicated that the reporting for this study will be towards the end of 2017. In addition to this, Scottish Borders Council made official representations to Network Rail within the consultation phase of the Scotland Route Study (ASD80), which is part of the longer term planning process for Network Rail and helps to influence decision making between 2019 and 2029. The response recommended the provision of additional dynamic loop provision to help improve service reliability and functionality on the existing Borders Railway and also recommended train lengthening for both peak and off-peak services to help cope with existing and predicted patronage levels.

Provision of parking at railway stations is an issue for Scottish Borders / Midlothian Council and Network Rail. **No modification proposed.**

Energy and Infrastructure

Eyemouth Harbour Trust (031900)

Disagree with proposed modification. The Proposed Plan has identified a new station at Reston as a Strategic Transport Improvement, while Reston and Eyemouth have both been identified as areas of Strategic Growth 2018 - 2030.

There is also a clear statement in paragraph 4.12 which references the potential for Eyemouth and Dunbar harbours to service offshore wind farms, highlighting this as an issue which needs to be addressed to ensure the continued viability of rural industries. **No modification proposed.**

Peebles Community Trust (810911)

SESplan recognises the importance of delivering improvements across the regional transport network and it is noted that East - West connections in the Scottish Borders could be improved. However, this infrastructure is a matter for Transport Scotland and Scottish Borders Council. **No modification proposed.**

SP Energy Networks (034701)

Disagree with proposed modification. It is acknowledged there is a need to support large scale electricity developments. However, in considering such proposals, planning authorities also have a duty to give consideration to and protect the landscape and environment. It is SESplan's view that the proposed modification does not give fair weight to potential conflicts arising from grid transmission projects. **No modification proposed.**

Plan designations

Amber Real Estate (040040)

Disagree with proposed modification. Although Greenlaw is not identified in Figure 3.5 as a Rural Growth Area, this does not prohibit consented development from taking place through the LDP process. Greenlaw currently contains three allocated housing sites and one long term housing site identified in the LDP, as well as two mixed use sites and one industrial safeguarded site. Important to note that the Proposed Plan highlights areas of strategic growth and Rural Growth Areas within Scottish Borders, but does not prohibit development in other areas. **No modification proposed.**

H and H Group Plc (927998)

Disagree with proposed modification. Two Borders Rail Clusters are currently identified by the proposed plan, at Galashiels and Tweedbank. Transport Scotland is currently undertaking a Pre-Feasibility Transport Corridor Study which includes the proposal to extend the railway to Hawick and Carlisle. Transport Scotland has indicated that the reporting for this study will be towards the end of 2017. The Strategic Development Plan highlights strategic growth and Rural Growth Areas within Scottish Borders, but does not prohibit development in other areas. **No modification proposed.**

Scottish Wildlife Trust (038549)

Disagree with proposed modification. The Enhanced Green Network section of the plan (paragraphs 5.20 – 5.21) outlines clear guidance to member authorities on this issue. Paragraph 5.20 states that 'SESplan member authorities will prepare non-statutory Frameworks for the other Green Network Priority Areas and incorporate the key elements of these frameworks into the relevant Local Development Plan at the first opportunity'. Paragraph 5.21 directs that 'These frameworks will: Identify and safeguard those elements of the green network that provide, or have the potential to provide, the greatest benefits for people and nature; Identify strategic enhancements to green networks that will add value to existing settlements,

developments for which land has already been allocated, and any new allocations in subsequent Local Development Plans; Provide an additional context for planning decisions'. The Green Network Technical Note (ASD55 October 2016) also contains a more detailed assessment of each Green Network Priority Area – this assesses each area against the nine green network themes, including biodiversity. **No modification proposed.**

Spatial Strategy

Mr Kenneth Gunn (039664)

SESplan disagree that the spatial strategy of the Proposed Plan needs modifying to give greater focus to Selkirk. The role of the SDP is to provide direction to LDPs in the city region by identifying key areas and directions for strategic growth. The Proposed Plan identifies Selkirk as an area of Strategic Growth 2018 - 2030. The wider area surrounding Selkirk is identified as a Rural Growth Area.

It is the responsibility of individual local authorities to identify the impact of development within their area on non-strategic infrastructure such as education and no direction on this matter is required within the SDP. Education infrastructure is the responsibility of individual local authorities, LDPs and Action Programmes.

As set out in paragraph 5.8 of the Proposed Plan, current housing land estimates (Table 11.2 in Housing Background Paper) indicate that there is sufficient housing land supply to meeting the Scottish Borders Housing Land Requirement (ASD22). Therefore it is currently estimated that the next Scottish Borders LDP will not be allocating additional housing land.

Town Centres are dealt with elsewhere in paragraphs 5.14 – 5.16 of the Proposed Plan. Paragraph 5.16 contains a clear direction to member authorities stating that 'Local Development Plans will apply a Town Centre First policy.' The Scottish Borders LDP also identifies all main town centres as opportunities for regeneration. **No modification proposed.**

Other issues

Rural Renaissance (039402)

SPP contains a presumption in favour of development which contributes to sustainable development. It is not the purpose of the Proposed Plan to repeat policies or policy context from elsewhere. **No modification proposed.**

Scottish Environmental Protection Agency (790577)

Disagree with proposed modification. As set out in paragraph 5.8 of the Proposed Plan, current housing land estimates (Table 11.2 in Housing Background Paper) indicate that there is sufficient housing land supply to meeting the Scottish Borders Housing Land Requirement (ASD22). Therefore it is currently estimated that the next Scottish Borders LDP will not be allocating additional housing land. The Placemaking Principles section of the plan (Table 3.1) also makes clear that development should be located away from functional flood plains and areas of medium to high flood risk. **No modification proposed.**

9 representations of support for this section of the Proposed Plan are noted.

Reporter's conclusions:
[Note: For DPEA use only.]
Reporter's recommendations:
[Note: For DPEA use only.]