

Issue 4.2	Rural Economy	
Development Plan reference:	A Place to do Business – Rural Economy, page 34, para 4.8 – 4.12.	Reporter: [Note: For DPEA use only.]
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Borders Network of Conservation Groups (039614) Mr Andrew Carnduff (035138) Denholm and District Community Council (040612) EDF Energy Renewables Ltd (039326) Eyemouth Harbour Trust (031900) Gullane Area Community Council (037068) Haddington and District Amenity Society (803807) Minto Hills Conservation Group (040607)</p>	<p>Neart na Gaoithe Offshore Wind Ltd (034699) North Berwick Community Council (035522) Peebles Community Trust (810911) Penicuik Estate/Penicuik House Preservation Trust (037926) RSPB Scotland (031480) Royal Yachting Association (870419) Scottish Wildlife Trust (038549) SP Energy Networks (034701) SSE Renewables Ltd (040624) Mr Charles Strang (907037) Wemyss Estate Trustees (034644)</p>	
Provision of the Development Plan to which the issue relates:	A place to do business and the rural economy.	
Planning Authority's summary of the representation(s):		
<p><u>Borders Network of Conservation Groups (039614)</u> Plan gives little weight to the benefits of the rural areas to the rural population; this defines the way people in the countryside live and conduct their business. Tourism should be emphasised more for jobs and economy of rural areas particularly Scottish Borders (RSD04 2012 The Economic Value of Landscape in the Scottish Borders). Quality of landscape is an essential part of this. New National Park in southern Borders should be included in the Plan as an aspirational project requiring further appraisal.</p> <p><u>Mr Andrew Carnduff (035138)</u> Plan does not include reference to harbours and coastline which are important for the economy, quality of life and tourism. The region's coastline and harbours provide access for trade, commerce, sport and recreation and have been the basis for history and culture. Marine-based economy requires particular inclusion within the plan. Sea coast assets including harbours, piers and wharves should be identified in the plan and local authorities directed to recognise, identify, protect and develop them. Sea coast should also be protected for wildlife as a continuous strip. Marine interface is a cross-boundary contributor to the economy. Individual elements of the coastline are attributed disparately to different sections of the plan. Request that a cluster be identified for sea coast activity and related onshore</p>		

activities. This could include tourism, ferries, wildlife watching, nature conservation, yacht cruising, long distance walking routes etc.

Denholm and District Community Council (040612)

Reference to Borderlands initiative non-specific, does not specify improvements.

EDF Energy Renewables Ltd (039326)

No reference to role of onshore wind development in rural economy in line with recent planning decisions and NPF. Should also recognise socio-economic benefits to rural communities which could arise from community / shared ownership of renewable energy developments.

Eyemouth Harbour Trust (031900)

Include facilitation of Eyemouth Harbour for renewables industry.

Gullane Area Community Council (037068)

Lack of high speed broadband and mobile signals inhibit rural economy. Paragraph 4.12 states 'SESplan member authorities will therefore support the continued operation, diversification and expansion of rural businesses' does not offer concrete suggestions on how this will be done.

Haddington and District Amenity Society (803807)

Agriculture, the rural economy and landscape assets of East Lothian are considered to be essential. The Proposed Plan should make a stronger commitment to developing the rural economy of East Lothian through agriculture and active leisure. East Lothian has a shortage of employment opportunities and should be a centre for developing the rural economy. The importance of the rural economy is not given sufficient prominence in the proposed plan.

Minto Hills Conservation Group (040607)

4.9 More reference and recognition to tourism and its potential to contribute to the local and city economy. Scottish Borders needs coherent management of scenic beauty, cultural heritage, tourism and events programmes and protecting our natural and cultural assets in the future.

4.12 should include reference to member authorities supporting tourism infrastructure in rural areas as a priority.

Neart na Gaoithe Offshore Wind Ltd (034699)

Nationally significant major energy transmission developments are likely to occur within rural areas of the region. This relates to NPF national development 4. Local Development Plans should be directed to safeguard nationally significant routes for energy transmission infrastructure which might prejudice its development.

North Berwick Community Council (035522)

Uncertainty over LEADER and Forth Fisheries Local Action Group (FLAG) work post European referendum. High speed broadband and 4G mobile coverage disadvantage rural economy in North Berwick.

Peebles Community Trust (810911)

Welcome the inclusion of the Borderlands initiative in the narrative. Over-

emphasises FLAG programme relative to land-based rural economic development. Add additional reference to rural business/economic opportunities in its place.

Penicuik Estate/Penicuik House Preservation Trust (037926)

Concern about lack of reference to heritage assets and strategic contribution these make. Enabling development should be explored to support the cost of maintaining such assets, such as Penicuik Estate in Penicuik Designated Landscape. Land at Penicuik Estate could be used to meet housing targets or employment land allowing restoration, conservation and enhancement of Penicuik House.

RSPB Scotland (031480)

Need to recognise the need for rural businesses and growth to be sustainable and not have a negative impact on wildlife. Ecosystem approach, including farming, forestry and low carbon energy generation.

Royal Yachting Association (870419)

Section 4.8 needs to be elaborated as it underplays the current and potential use of the Firth of Forth for recreational and tourism purposes. These activities depend on the provision and retention of appropriate shoreside facilities and would benefit from wider co-ordination.

Scottish Wildlife Trust (038549)

Not enough emphasis on the role of ecosystems in rural economy.

SP Energy Networks (034701)

Nationally significant major energy transmission developments are likely to occur within rural areas of the region. This relates to NPF national development 4. LDPs should be directed to safeguard nationally significant routes for energy transmission infrastructure which might prejudice its development.

SSE Renewables Ltd (040624)

Should recognise onshore wind development in contributing to sustained viability of rural areas.

Mr Charles Strang (907037)

The development of high-speed broadband for all is an essential, and must be given the highest prominence in the action plan.

Wemyss Estate Trustees (034644)

Add new paragraph to make specific reference to heritage assets and reference a clear direction to LDP's on enabling development to allow restoration of heritage assets.

Modifications sought by those submitting representations:

Borders Network of Conservation Groups (039614)

Give more weight to benefits of rural areas to the rural population. Emphasise important role of tourism in rural economy. Include proposal for new National Park in southern Borders.

Mr Andrew Carnduff (035138)

At paragraph 4.8 / 4.9, insert "More than 50 former small commercial or fishing harbours offer current and developable opportunity for use in sport, recreation, tourism and in smaller marine service provision".

Denholm and District Community Council (040612)

No modification proposed, however, representation implies more detailed information is required on Borderlands improvements.

EDF Energy Renewables Ltd (039326)

Add role of onshore wind in rural economy and community benefits to Rural Economy paragraphs 4.8 - 4.12.

Eyemouth Harbour Trust (031900)

Paragraph 4.12 - Amend sentence "the potential for harbours such as Eyemouth and Dunbar to service offshore wind farms" to read "the potential for harbours such as Eyemouth and Dunbar to service offshore wind farms, including the provision of essential associated infrastructure such as a helicopter facility at or near Eyemouth Harbour."

Gullane Area Community Council (037068)

Identify provision of high speed broadband and improvements to mobile phone coverage in rural areas as priorities.

Haddington and District Amenity Society (803807)

The Proposed Plan should make a stronger commitment to developing the rural economy of East Lothian through agriculture and active leisure.

Minto Hills Conservation Group (040607)

Amend paragraph 4.9 to include more reference and recognition to tourism and its potential to contribute to the local and city economy. Scottish Borders needs coherent management of scenic beauty, cultural heritage, tourism and events programmes and protecting our natural and cultural assets in the future

Amend paragraph 4.12 to include reference to member authorities supporting tourism infrastructure in rural areas as a priority.

Neart na Gaoithe Offshore Wind Ltd (034699), SP Energy Networks (034701)

Add new paragraph 4.13, stating as follows: 'Rural parts of the city region have seen, and will likely see more, proposals for development relating to significant electricity transmission infrastructure, including that associated with major offshore wind farms in the outer Firth of Forth. Local Development Plans should facilitate the delivery of nationally significant electricity transmission infrastructure in rural locations dictated by operational requirements and safeguard such infrastructure against conflicting development which might jeopardise its delivery.'

North Berwick Community Council (035522)

Plan should reflect uncertainty over LEADER and Forth Fisheries Local Action Group work post European referendum. Plan should address high speed broadband and 4G mobile coverage.

Peebles Community Trust (810911)

Add additional reference to rural business / economic opportunities in place of references to Forth FLAG programme.

Penicuik Estate/Penicuik House Preservation Trust (037926)

Add additional paragraph after paragraph 4.12: 'SESplan recognises the importance of heritage assets in south east Scotland and the contribution they can make to economic development and amenity for existing and prospective residents. Local Development Plans will provide a framework to allow enabling development to support the restoration, conservation and enhancement of heritage assets. Such enabling development should not be limited to on-site new build. Off-site development, should be allowed, where the circumstances require this and where land is available.'

RSPB Scotland (031480)

Add specific reference to highlight the need to consider potential impacts of rural business growth, including farming, forestry and low carbon energy generation, on nature and protected areas.

Royal Yachting Association (870419)

Amend third sentence of paragraph 4.8 to read as follows: 'The region boasts an attractive coastline and a number of operational commercial and recreational harbours. However, many of them are old, are vulnerable to storm damage and require regular dredging to permit continued use. Moreover, there are other harbours, such as Bo'ness that could be further developed for recreation and tourism purposes.'

Extend Fife Harbours Study (RSD05) to cover all of region.

Scottish Wildlife Trust (038549)

No modification specified, indicates this section of the Proposed Plan needs more emphasis on the role of ecosystems in rural economy.

SSE Renewables Ltd (040624)

No modification specified, representation implies Proposed Plan should recognise onshore wind development in contributing to sustained viability of rural areas.

Mr Charles Strang (907037)

Development of high speed broadband must be a priority in the Action Programme.

Wemyss Estate Trustees (034644)

After paragraph 4.12 insert: 'SESplan recognises the importance of heritage assets across the region and the contribution they can make to economic development and amenity for existing and prospective residents. Local Development Plans will provide a framework to allow enabling development to support the restoration, conservation and enhancement of heritage assets. Such enabling development should not be restricted to limited on-site new build. Off-site development should be allowed where appropriate and where land is available.'

Summary of responses (including reasons) by Planning Authority:

Rural Economy

Borders Network of Conservation Groups (039614), Minto Hills Conservation Group (040607)

SESplan is intended to be a concise, visionary, map based document which identifies key areas and directions for strategic growth. The plan identifies assets throughout the region, and also identifies key areas of change including areas of Strategic Growth 2018 - 2030 and Rural Growth Areas. The plan also identifies a number of significant business clusters, while at local level, LDPs will continue to support and identify rural opportunities where possible, including tourism. **No modification proposed.**

In relation to tourism, paragraph 4.8 clearly states 'The rural areas provide significant benefits to the urban population including food production, water supply, renewable energy, timber production and tourism and recreation.' Paragraph 4.9 of the Proposed Plan goes on to state: 'These assets support a diverse range of loose business clusters in small and medium scale businesses include tourism, food and drink, textiles manufacturing, farming and forestry, low carbon and creative and niche industries. These businesses make a significant contribution to the city region economy.' The plan makes clear, early reference to cultural and heritage assets (page 4 - 5 SESplan Assets), including tourism assets. Opportunities for tourism are also highlighted in Table 4.1 Significant Business Clusters. The Strategic Walking and Cycling Routes identified in figure 6.1 and paragraphs 6.5 - 6.8 also contribute to tourism in the region, in particular the longer distance Recreational Routes. **No modification proposed.**

Mr Andrew Carnduff (035138)

Disagree with proposed modification. SESplan's role is to identify the key areas and directions for strategic growth. There is no requirement to produce site specific allocations. SESplan has identified a number of Forth Coast Cluster locations at harbours on the Forth which have been identified as locations for investment. However, this does not preclude consented development from taking place elsewhere – development proposals, including at smaller harbours, can also be promoted through the LDP process. **No modification proposed.**

Denholm and District Community Council (040612)

No modification proposed, however, representation implies more detailed information is required on Borderlands improvements (paragraph 4.11). SESplan consider paragraph 4.11's inclusion in the plan gives ample acknowledgement at strategic level of the Borderlands initiative. SESplan is intended to be a concise, visionary, map based document. The plan supports cross boundary improvements and does also include a clear direction to member authorities that: 'Local Development Plans will safeguard land as necessary for strategic projects, including potential strategic cross boundary projects and longer term projects' (paragraph 6.13). **No modification proposed.**

Eyemouth Harbour Trust (031900)

Disagree with proposed modification – representations at this level of detail are considered an LDP issue, it is not the role of SESplan to make location specific

allocations. **No modification proposed.**

Haddington and District Amenity Society (803807)

Disagree with proposed modification. SESplan's role is to identify the key areas and directions for strategic growth throughout the plan area. At a local level the LDP will continue to support and identify rural opportunities where possible. Active leisure is supported by the plan, and upgrading cycle routes on the A199 to create a strategic functional cycle route linking Edinburgh to East Lothian has been highlighted as a priority (paragraph 3.17). There is also a clear directive in paragraph 4.12 which states that 'SESplan member authorities will therefore support the continued operation, diversification and expansion of rural businesses.'

No modification proposed.

Minto Hills Conservation Group (040607)

Disagree with proposal in relation to tourism infrastructure. There is a clear direction in paragraph 4.12 which states 'SESplan member authorities will therefore support the continued operation, diversification and expansion of rural businesses.' Strategic infrastructure improvements have been identified by the Proposed Plan. Further infrastructure needs to specific sectors can be highlighted and promoted through the LDP process. **No modification proposed.**

North Berwick Community Council (035522), Peebles Community Trust (810911)

Disagree with proposed modification in relation to uncertainty over LEADER and Forth Fisheries Local Action Group work post European referendum. It is too early to predict what impact the referendum will have on these working groups. **No modification proposed.**

Peebles Community Trust (810911)

Disagree with proposed modification. The Spatial Strategy section of the plan identifies locations for investment throughout the plan area, and also identifies key areas of change including areas of Strategic Growth 2018 - 2030 and Rural Growth Areas. The plan identifies a number of Significant Business Clusters and Strategic Transport Improvements in rural areas, while at local level, LDPs will continue to support and identify rural opportunities where possible. There is a clear direction in paragraph 4.12 which states 'SESplan member authorities will therefore support the continued operation, diversification and expansion of rural businesses.' It is not therefore considered the Proposed Plan requires further reference to rural business in place of the Forth FLAG programme. **No modification proposed.**

Royal Yachting Association (870419)

Disagree with suggestion to specifically add reference to Bo'ness Harbour in paragraph relating to the rural economy. Bo'ness does not sit within the SDPA area. The Spatial Strategy section of the Proposed Plan identifies areas of Strategic Growth 2018 - 2030 in addition to Significant Business Clusters and Forth Coast Clusters. However, this does not preclude consented development from taking place elsewhere. **No modification proposed.**

Disagree with modification in relation to extending the Fife Harbours Study (RSD05) to cover all of region. SESplan notes the response, but considers this scale of initiative to be most effective at a local partnership / LDP level. **No**

modification proposed.

Enabling Development

Penicuik Estate / Penicuik House Preservation Trust (037926), Wemyss Estate Trustees (034644)

Disagree with proposed modification. SESplan would consider enabling development to be a local authority matter to consider and do not support the introduction of a specific direction to member authorities / LDPs on this matter at a strategic level. Scottish Planning Policy (paragraph 142, ASD06) also contains clear guidance on this matter. **No modification proposed.**

Energy, Renewables and Infrastructure

EDF Energy Renewables Ltd (039326), SSE Renewables Ltd (040624)

Disagree with proposed modification. Paragraph 4.8 makes clear reference to the benefits of renewable energy on the rural economy. In addition, paragraph 4.27 (A Low Carbon Economy) states: 'Wind farm developments in the region, particularly in the Scottish Borders and in East Lothian have already made a major contribution to Scotland's transition to a low carbon economy.' **No modification proposed.**

Gullane Area Community Council (037068), North Berwick Community Council (035522), Mr Charles Strang (907037)

SESplan acknowledge essential role of high speed broadband in the rural economy, but disagree with proposed modification. The first two lines of paragraph 4.12 clearly state: 'There are issues to be addressed to ensure the continued viability of rural industries. These include the development of high speed broadband...' The rollout of superfast broadband is a reserved area of government policy – the UK government has responsibility for setting out policy and budgets, and the Scottish Government has responsibility for delivery. In this regard, it is not considered appropriate to add this to the Action Plan. **No modification proposed.**

Neart na Gaoithe Offshore Wind Ltd (034699), SP Energy Networks (034701)

Disagree with proposed modification. It is acknowledged there is a need to support large scale electricity developments occurring in the region, including those related to National Developments. It is considered however, that should specific proposals come forward there are sufficient procedures in place for their consideration and safeguarding. **No modification proposed.**

Environment

Borders Network of Conservation Groups (039614)

Disagree with proposed modification in respect to 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 SNH. It is not considered the role of SESplan and the SDP to confirm such designations. **No modification proposed.**

RSPB Scotland (031480)

Disagree with proposed modification. This is considered a matter for LDPs to address, in conjunction with SPP, local landscape designations and relevant supplementary guidance where applicable. Strategic Environmental Assessments /

Habitat Regulations Assessments will also be used where appropriate to assess environmental impacts of specific proposals. **No modification proposed.**

Scottish Wildlife Trust (038549)

No modification specified, representation indicates more information required on the role of ecosystems in rural economy – this is dealt with elsewhere in the plan in the Enhanced Green Networks section and the Green Network Technical Note (ASD55 - October 2016). **No modification proposed.**

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

Reporter's conclusions:

[Note: For DPEA use only.]

Reporter's recommendations:

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