

A MEETING of the SESPLAN JOINT COMMITTEE will be held in the DEAN OF GUILD ROOM,  
EDINBURGH CITY CHAMBERS, EDINBURGH on MONDAY, 13 MARCH 2017 at 2.00 pm

<b>BUSINESS</b>		
1.	<b>Apologies for Absence and Substitutions</b>	-
2.	<b>Order of Business and Any Urgent Matters</b>	-
3.	<b>Declarations of Interest</b>	-
4.	<b>Matters Arising</b>	-
5.	<b>Minutes of the SESplan Joint Committee 28 November 2016 (Paper)</b> (Pages 1 - 4)	Decision
6.	<b>Proposed Strategic Development Plan 2 - Submission for Examination (Paper)</b> (Pages 5 - 376)	Decision
7.	<b>Development Plan Scheme 9 (Paper)</b> (Pages 377 - 394)	Decision
8.	<b>Annual Housing Update (Paper)</b> (Pages 395 - 408)	Decision
9.	<b>Finance (Paper)</b> (Pages 409 - 420)	Decision
10.	<b>Annual Audit Plan 2016/2017 (Paper)</b> (Pages 421 - 436)	Decision
11.	<b>Planning Review (Verbal)</b>	Noting
12.	<b>A.O.C.B.</b>	-

**NOTE - Members are reminded that, if they have a pecuniary or non-pecuniary interest in any item of business coming before the meeting, that interest should be declared prior to commencement of discussion on that item. Such declaration will be recorded in the Minute of the meeting.**

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**Membership of Committee**

City of Edinburgh Council — Cllr I Perry and Cllr A Lunn  
East Lothian Council — Cllr N Hampshire and Cllr T Day  
Fife Council — Cllr L Laird (Vice Convener) and Cllr J Wincott  
Midlothian Council — Cllr J Bryant and Cllr K Parry  
Scottish Borders Council — Cllr S Bell (Convener) and Cllr R Smith  
West Lothian Council — Cllr T Boyle and Cllr C Muldoon

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Please direct any enquiries to Louise McGeoch, Clerk to the SESplan Joint Committee  
Tel: 01835 825005, Email: [lmcgeoch@scotborders.gov.uk](mailto:lmcgeoch@scotborders.gov.uk)

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The Strategic Development Planning Authority  
for Edinburgh and South East Scotland

MINUTE of MEETING of the SESplan JOINT COMMITTEE  
held in the Edinburgh City Chambers on 28 November  
2016 at 2.00 p.m.

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Present:- Councillor Stuart Bell (Convener), Scottish Borders Council  
Councillor Lesley Laird, Fife Council (Vice Convenor)  
Councillor Ian Perry, City of Edinburgh Council  
Councillor Ron Smith, Scottish Borders Council (by conference call)

Apologies:- Councillor Tony Boyle, West Lothian Council  
Councillor Jim Bryant, Midlothian Council  
Councillor Tim Day, East Lothian Council  
Councillor Norman Hampshire, East Lothian Council  
Councillor Alex Lunn, City of Edinburgh Council  
Councillor Cathy Muldoon, West Lothian Council  
Councillor Kelly Parry, Midlothian Council  
Councillor John Wincott, Fife Council

In Attendance:- Mrs Alice Miles, SESplan Lead Officer  
Mr John Bury, City of Edinburgh Council  
Ms Pam Ewen, Fife Council  
Mr Brian Frater, Scottish Borders Council  
Mr Ian Johnson, Midlothian Council  
Ms Fiona McBrierty, West Lothian Council  
Mr Iain McFarlane, East Lothian Council  
Mrs Louise McGeoch, Scottish Borders Council (Clerk)

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1. ORDER OF BUSINESS AND ANY URGENT MATTERS

The Convener advised that there were no changes to the order of business or urgent matters to be considered.

2. MATTERS ARISING

2.1 Appointment of Acting Strategic Development Plan Manager

With reference to paragraph 4 of the Minute of 26 September 2016, the Convener asked for an update on the current status of the Manager position. John Bury reported that the Board was working with SEStran on proposed arrangements. Revised legal documents had been sent by the Joint Committees legal adviser and the intention was to have the new arrangements in place by the beginning of January if all issues were resolved.

2.2 Planning Performance Framework 2015-16

With reference to paragraph 6 of the Minute of 26 September 2016, the Convener advised that he had received a positive reply from Kevin Stewart, Minister for Local Government and Housing in response to the achievement of a green rating in all six areas of performance. The Convener would copy the letter to all Members of the Joint Committee.

DECISION

NOTED the above.

3. MINUTE OF PREVIOUS MEETING

The Minute of Meeting of 26 September 2016 had been circulated.

DECISION

APPROVED the Minute as a correct record.

4 RISK MANAGEMENT

There had been circulated copies of a report by the SESplan Lead Officer providing an update on risk management. The report explained that the risk register had been updated by closing risks that were no longer applicable or current. The probability and impact scores associated with individual risks had also been revised to reflect the current stage of the programme. Of those risks that remained active, there were five project related risks and four operational risks which had a residual amber risk score and these were detailed in the report. Councillor Perry commented on the Cross Border Transport Study and concerns regarding the financing of any cross-border transport projects. It was considered that a discussion on this matter was required with Transport Scotland. Councillor Laird commented on the wider Strategic Transport Project Review and how it would fit with individual Local Development Plans. She also suggested that an additional risk around budget setting needed to be added given the various uncertainties around Council budget settlements and the Government White Paper on the Planning Review. The Convener suggested that the Board arrange to meet with Transport Scotland and advise should Joint Committee input be required before the next meeting in March 2017.

DECISION

AGREED to note the update on risk management as set out in the report, subject to the inclusion of text to address the concerns of Members relating to cross border transport projects and budget setting for 2017 / 2018.

5. SESPLAN JOINT COMMITTEE WORK PLAN 2017

There had been circulated copies of a report by the SESplan Lead Officer setting out the work plan of the SESplan Joint Committee to the end of 2017.

DECISION

AGREED to approve the SESplan Joint Committee Work Plan as set out in Appendix 1 to the report.

6. ANNUAL HOUSING LAND UPDATE

There had been circulated copies of a report by the SESplan Planner on how and when the 2016 SESplan Housing Land Update would be produced. The report noted that Housing Land Audits were still to be received from East Lothian, Scottish Borders and West Lothian Councils in early December to allow the Update to be prepared by the end of the year. The Lead Officer reported that these are now expected to be received late December / early January with the update to be produced and finalised in the New Year.

DECISION

NOTED the above.

## 7. FINANCE

There had been circulated copies of a report by the SESplan Lead Officer presenting details of the expenditure against the approved Operating Budget for 2016 / 2017 up to October 2016, the total forecast of expenditure against the approved Operating Budget for 2016 / 2017 and the Operating Budget for 2017 / 2018, 2018 / 2019 and 2019 / 2020. Councillor Laird highlighted the fact that Councils were not receiving their own budget settlements until 15 December and suggested that it would be prudent to only approve the budget in principle at this stage. Members discussed this suggestion and agreed that a further report on the final budget position be presented at their next meeting in March.

### DECISION

AGREED to:-

- (a) note the expenditure against the approved Operating Budget for 2016 / 2017 up to October 2016 as set out in Appendix 1 to the report;
- (b) note the total forecast expenditure against the approved Operating Budget for 2016 / 2017 as set out in Appendix 1 to the report;
- (c) approve in principle the Operating Budget for 2017/2018 as set out in Appendix 1 to the report;
- (d) note the Operating Budgets for 2018/2019 and 2019/2020 as set out in Appendix 1 to the report;
- (e) note that member contributions for financial year 2017/2018 would be set at no greater than £46,550 (excluding VAT) per authority, payable to Fife Council by the 30 April 2017 subject to a review in March 2017; and
- (f) note that member authorities would be required to ratify the decisions above by the end of December 2016 and to make their required contributions subsequently.

## 8. SUMMARY OF REPRESENTATIONS RECEIVED ON PROPOSED SDP2

The SESplan Lead Officer advised that the period for submitting representations had closed at 5 pm the previous Thursday. 168 representations had been received, which was comparable with SDP1, containing around 800 comments. These would now be read and any local issues referred to the appropriate local authority. All representations would be published on the SESplan portal and a list sent to all members of the Joint Committee.

### DECISION

NOTED.

## 9. AOCB

There was no other business to consider.

### DECISION

NOTED.

*The meeting concluded at 3.00 p.m.*

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**ITEM 6 – STRATEGIC DEVELOPMENT PLAN 2 SUBMISSION**

Report by: Alice Miles, Acting SDP Manager

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**Purpose**

This Report seeks Joint Committee approval of the Strategic Development Plan Authority's response to the representations received on the second Proposed Strategic Development Plan (the Proposed Plan), agreement that no modifications should be made to the Proposed Plan in response to these representations and approval of the Proposed Plan for submission to Scottish Ministers for Examination.

**Recommendations**

It is recommended that the SESplan Joint Committee:

1. Approve the Summary of Unresolved Issues and note the representations received set out within the Schedule 4s referred to in Section 2 below and attached as Appendix 1 to this Report;
2. Agree that no modifications are made to the Proposed Plan published in October 2016;
3. Delegate authority to the SDP Manager and Chair of the Project Board to undertake editorial changes and finalise the Schedule 4s and related material for submission to Scottish Ministers for Examination as set out in Section 3 below;
4. Approve the Report of Conformity with the Participation Statement attached as Appendix 2 to this Report; and
5. Approve the unmodified Proposed Plan for submission to Scottish Ministers by no later than 27 June 2017.

**Resource Implications**

As set out below.

**Legal and Risk Implications**

As set out below.

## Policy and Impact Assessment

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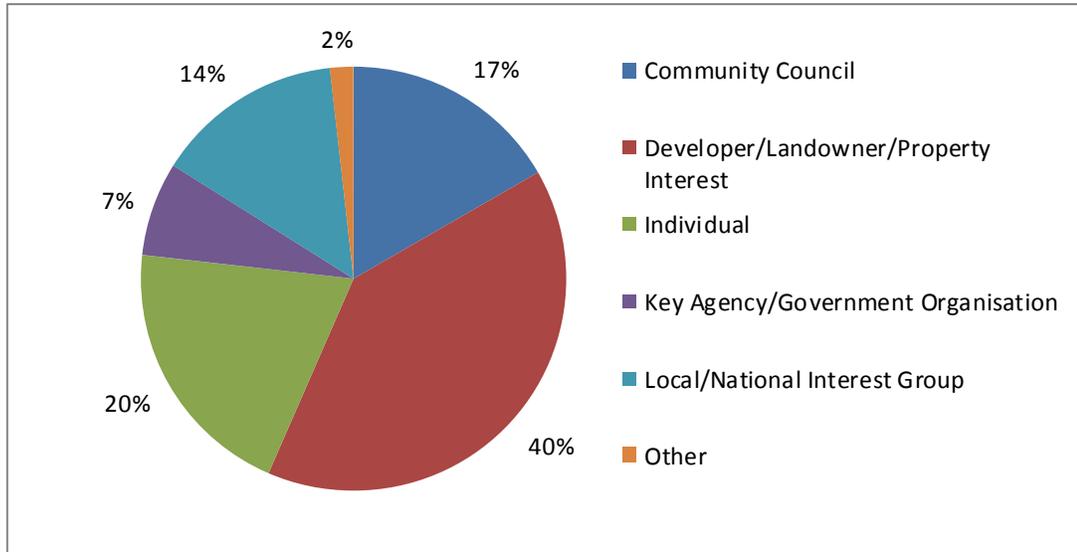
No separate impact assessment is required.

### 1. Background

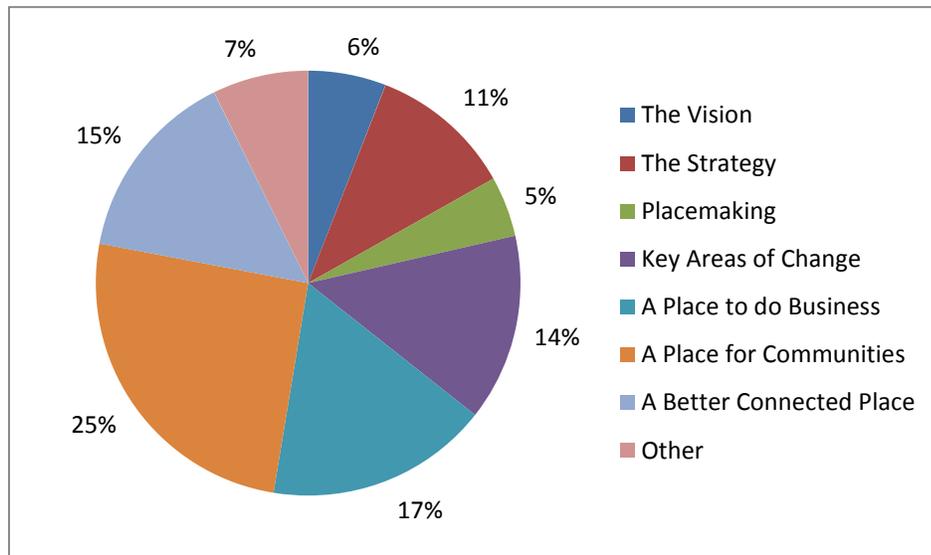
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- 1.1 The first Strategic Development Plan (the current SDP) was approved by Scottish Ministers on the 27 June 2013. The Planning etc. Scotland (Act) 2006 Section 10(8) requires that a second proposed Strategic Development Plan (the Proposed Plan) must be submitted for Examination within 4 years of the approval of the current SDP i.e. no later than 27 June 2017.
- 1.2 As set out in the published Development Plan Scheme and reported to Joint Committee, work on the Proposed Plan began with early awareness raising in April 2014. This was followed by the preparation of a Main Issues Report which was published for a 10 week consultation on the 21 July 2015. A total of 240 consultees responded raising 2,765 comments.
- 1.3 These comments fed into the preparation of the Proposed Plan which was approved for publication by the SESplan Joint Committee on the 20 June 2016. Following ratification by each of the six member authorities, the Proposed Plan was published for a six week period for representations on the 13 October 2016. A total of 802 representations were received from 168 representees. As shown in Figure 1 below, the majority of representees (40%) were developers, landowners and or property interests. This was followed by individuals (20%) and community councils (17%).
- 1.4 As shown in Figure 2 below, 25% of representations raised comments on the Place for Communities chapter within the Proposed Plan which covers housing, town centres and green networks. Around 17% related to a Place to do Business (locations for investment, responsible resource extraction and zero waste), 15% related to a Better Connected Place (supporting non car travel, strategic transport improvements and funding transport infrastructure) and 14% related to the key areas of change in the South East, Edinburgh and West, Scottish Borders and Fife.

**Figure 1 – Breakdown of Proposed Plan Representations by Consultee**



**Figure 2 – Breakdown of Proposed Plan Representations by Theme**



1.5 All representations received on the Proposed Plan are available to view on the [SESplan Consultation Portal](#).

**2. The Issues**

2.1 Following the close of the period for representations in November 2016, the 802 representations received have been analysed. Paragraph 106 of Circular 6/2013 (Development Planning) states that in preparing a Plan for Examination, the planning authority must prepare a summary of unresolved issues. This summary is to group the representations into a smaller number of issues. It is to:

- Number and list all the unresolved representations and name the people making the representations;
- Include a summary of the issues raised in the representations, in the form of a Schedule 4, with a separate Schedule 4 used for each group of unresolved issues; and
- Include the authority's reasons for not modifying the Plan.

2.2 On this basis 17 issues have been identified. These are set out within 25 Schedule 4s attached as Appendix 1 to this Report:

- Issue 1 – The Vision;
- Issue 2 – The Strategy;
  - Issue 2.1 – The Spatial Strategy;
  - Issue 2.2 - Green Belt and Related Designations;
  - Issue 2.3 – Brownfield Land;
  - Issue 2.4 – Prime Agricultural Land;
  - Issue 2.5 – Key Area of Change South East;
  - Issue 2.6 – Key Area of Change Edinburgh and West;
  - Issue 2.7 – Key Area of Change Fife;
  - Issue 2.8 – Key Area of Change Scottish Borders;
- Issue 3 – Placemaking Principles;
- Issue 4 – Investment and Employment;
  - Issue 4.1 – Investment and Employment;
  - Issue 4.2 – Rural Economy;
- Issue 5 – Responsible Resource Extraction;
- Issue 6 – Zero Waste;
- Issue 7 – A Low Carbon Economy;
- Issue 8 – Increasing Housing Delivery;
- Issue 9 – 2018 – 2030 Period and Five Year Land Supply;
- Issue 10 – Affordable and Specialist Housing;
- Issue 11 – Thriving Town Centres;
- Issue 12 – Enhanced Green Networks;
- Issue 13 – Supporting Non Car Travel;
- Issue 14 – Strategic Transport Improvements;

- Issue 15 – Funding Transport Infrastructure;
- Issue 16 – Other Infrastructure; and
- Issue 17 – Other Issues.

2.3 No representations have been received which would require a change to the Proposed Plan’s strategy and / or themes around the Vision, Spatial Strategy, a Place to do Business, a Place for Communities and a Better Connected Place. It is therefore recommended that no modifications are made to the Proposed Plan.

2.4 A summary of the issues is set out below.

### **The Vision**

2.5 Around 50 representations were received on the Vision. These are considered within Issue 1. Representations considered amongst other matters that the Vision statement is too generic, not specific to the SESplan area, that it should be modified to make more specific reference to Edinburgh’s role in driving successful economic growth of the City Region. In response, the Vision statement is intended to be a broad statement which sets out the overarching objectives of the whole Proposed Plan area. Economic growth is a fundamental element of the plan and is dealt with further under the Spatial Strategy and a Place to do Business section of the Plan.

2.6 Other representees considered that named policies should be reintroduced to the Plan. In response, the Proposed Plan has made a deliberate shift away from the fifteen policies contained in the current Plan. This was an intentional move to make the Proposed Plan more accessible and give the entire document greater relevance. Decision makers must have regard to all provisions of the Plan, not just named policies and clear, specific directions to member authorities and Local Development Plans (LDP) have been highlighted throughout the plan in bold in the interests of clarity.

### **The Spatial Strategy**

2.7 Around 240 representations were made on the Spatial Strategy, Placemaking and Key Areas of Change sections of the Proposed Plan.

- 2.8 These are considered within Issues 2.1 (The Strategy), Issue 2.2 (Green Belt and Related Designations), Issue 2.3 (Brownfield Land), Issue 2.4 (Prime Agricultural Land), Issue 2.5 (Key Area of Change South East), Issue 2.6 (Key Area of Change Edinburgh and West), Issue 2.7 (Key Area of Change Fife), Issue 2.8 (Key Area of Change Scottish Borders) and Issue 3 (Placemaking Principles).
- 2.9 In terms of the Strategy there were a wide spread of representations from support for the principle of long term growth corridors to cautioning against over reliance on the city of Edinburgh in meeting housing needs of the wider city region. It was also considered by some representees that the long term growth corridors will accelerate the removal of farmland when the many advantages of dispersal, that would allow economic development to be promoted more evenly across the SESplan area, are ignored. There were also concerns that the required transport and community infrastructure will not be delivered to prevent development along the long term growth corridors becoming car based dormitory suburbs and that existing public transport infrastructure lessens with distance from Edinburgh.
- 2.10 In response to these representations the Proposed Plan strategy has been developed from the options consulted upon at Main Issues Report stage. The Spatial Strategy concentrates most new development in and around existing settlements, particularly Edinburgh. Strategic growth is also proposed for the rural growth areas in Scottish Borders, in the settlements of East and West Lothian and in Fife.
- 2.11 The strategy also identifies green belt and areas for improvements to green networks, including where these cross member authority boundaries. Much of the strategic growth forms long term proposals that are already identified in adopted and proposed LDPs. The settlement focus does not constitute ribbon development, as some respondents have suggested. Instead it reflects a strategy that concentrates the majority of new development in the settlements with the largest concentrations of people, jobs, services and facilities. As such this strategy promotes the reuse of previously developed land and buildings, reduces the need to travel and protects the countryside. The strategy ensures that homes are built close to employment. This strategy therefore avoids ribbon development.
- 2.12 Infrastructure is essential and new development brings with it the opportunity of improved infrastructure that may not otherwise be delivered.

2.13 The concentration of strategic growth in existing settlements, particularly in and around Edinburgh, is designed to provide more travel options and support the development of new / improved infrastructure and services to support non-car travel, particularly active travel.

## **A Place to do Business**

2.14 Issues 4.1, 4.2, 5, 6 and 7 deal with unresolved representations related to investment and employment the rural economy, responsible resource extraction, zero waste and a low carbon economy. Around representations were received on these areas of the Proposed Plan. Under investment and employment, representations considered that the business clusters identified in the Plan should be aspirational and should allow for housing to ensure that the allocation of employment land does not prevent brownfield sites being developed for housing. It was also considered that large employment sites must be based on the Placemaking Principles and green belt and greenfield sites such as farmland avoided. The City Region Deal was also considered to have a material impact on economic growth within the City Region and SDP2 should await the approval of a City Region Deal, in order that the plan can take it more fully into account.

2.15 In response, significant business clusters have been included in the Proposed Plan as required in Scottish Planning Policy (SPP) paragraph 98. Clusters can include National Renewable Infrastructure Plan (NRIP) sites, Enterprise Areas and other sites which as a group form broad economic locations of regional significance. The Proposed Plan instructs LDPs to adopt a flexible approach in relation to long term employment opportunities within the clusters.

2.16 The City Region Deal is referenced in paragraphs 2.3 and 2.4 of the Proposed Plan. This states that as the negotiations on the City Region Deal are continuing its impact on the plan is too early to predict. SESplan is required to submit the Proposed Plan within 4 years of the approval of the current Plan under planning legislation and therefore cannot delay preparation and submission of the Proposed Plan. It should also be noted that the City Region Deal could be considered as a means to implementing the Plan rather than a means of influencing it.

- 2.17 Under a Low Carbon Economy, representations raised concerns about the balance of wind farms and impacts on the environment and communities. It was considered that the Plan could more positively and accurately reflect national energy and policy position, giving support to national priorities for strategic energy infrastructure including generation, storage, transmission and distribution networks. The Plan should also address cross boundary issues, promoting an approach to electricity and heat that supports the transition to a low carbon economy. Scottish Government considers that it would be appropriate to prepare Supplementary Guidance on wind and heat.
- 2.18 In response, the Onshore Wind Spatial Framework (Figure 4.2) and paragraphs 4.27 to 4.29 in the Proposed Plan set out SESplan's approach to wind farm development and repowering. Figure 4.2 gives an indication, at a regional scale, of areas where there may be opportunities for new wind farm development. The Proposed Plan sets out in paragraph 4.28 how the plan's content will be further supported by a Cross-Boundary Wind Farm Working Group who will identify the strategic capacity for wind farms in the region and strategic repowering opportunities.
- 2.19 The Main Issues Report confirmed that many of the most suitable and least environmentally sensitive locations for wind farm development in the region had already been developed. Whilst SESplan recognise there may be further opportunities in the region and indeed opportunities around repowering, these are not considered to require separate strategic supplementary guidance.
- 2.20 Paragraph 4.25 and Table 3.1 Placemaking Principles set out SESplan's approach to strategic heat, stating the need for LDPs to identify opportunities for co-locating sources of high heat demand and supply. SESplan notes comments that the Proposed Plan could identify opportunities to link urban networks across local authority boundaries. However, while it is accepted that opportunities for heat networks may cross local authority boundaries, solutions for realising these rely on planning at a more detailed scale than what is achievable at the strategic planning level.
- 2.21 SESplan consider that preparing additional guidance, or a heat map at a strategic scale, would not add value to the plan beyond what is already available at a national level in the Scotland Heat Map and feels this role would be better performed through LDPs who can analyse heat data in relation to their site specific allocations. Work has already been undertaken by SESplan member authorities such as Fife Council on this matter.

2.22 The direction of energy and heat infrastructure is currently subject to national consultations through the Scottish Energy Strategy and Local Heat & Energy. This information may potentially succeed any guidance prepared at the strategic level.

### **A Place for Communities**

2.23 A large number of representations (around 160) were submitted relating to housing matters in the Proposed Plan (Issue 8 Increasing Housing Delivery, Issue 9 2018 – 2030 Period and Five Year Land Supply and Issue 10 Affordable and Specialist Housing), particularly the Housing Supply Targets (HSTs).

2.24 Some individuals and community councils stated that the HSTs were too high and that plan preparation should be paused to take account of 'Brexit'. The SESplan response is that the Proposed Plan is based on evidence and not unknowns and speculation. As stated above the Proposed Plan also has to be submitted by end June 2017 to meet statutory timescales.

2.25 The majority of responses from developers and landowners set out that the HSTs should be increased to match the estimates of need and demand in the 2015 Housing Needs and Demand Assessment (HNDA). The SESplan response to this is the same main points made last year when the Proposed Plan was published, namely that there is not the resources to deliver the level of affordable housing need identified in the HNDA. The affordable HSTs are higher than recent levels of affordable housing delivery, taking account of future expected affordable housing funding and innovative delivery models, but cannot be set at higher levels as HSTs are required to be reasonable and deliverable. Market HSTs exceed identified demand levels to help meet some of the affordable need shortfall through more affordable types of market housing, help to buy and other initiatives. The overall HSTs are ambitious, reasonable and considered deliverable over a 12 year period, subject to a sustained increase in housing delivery. The approach suggested to use the estimates of housing need and demand as the HSTs is not compliant with national policy set out in SPP and other related guidance. No response was received from the Scottish Government on housing matters in the plan, indicating that they were content with the approach taken.

2.26 Other multiple responses on housing were received on the generosity margin used to set Housing Land Requirements, the level of housing to be identified in subsequent LDPs to meet Housing Land Requirements, de-allocation of housing sites, the proportion of affordable housing to be provided on market sites and the criteria for assessing proposals when there is a shortfall in five year effective housing land supply.

### **A Better Connected Place**

2.27 Around 120 representations were received on this section of the Proposed Plan and were focused on Supporting Non Car Travel, Strategic Transport Infrastructure and Funding Transport Infrastructure. These are dealt with under Issues 13, 14 and 15.

2.28 Representations on supporting non car travel were largely supportive but often suggested specific new routes or changes to specific wording of requirements for LDPs.

2.29 The largest number of representations were submitted on Strategic Transport Infrastructure, with many suggesting further transport projects for inclusion or objecting to those that were included, notably the A701 Relief Road and A702 Link. Transport Scotland within their representation requested that the Levenmouth Rail Link and Halbeath Rail Halt be moved into the Strategic Longer Term Projects section of Table 6.1. This is dealt with under Issue 14. SESplan disagrees with the representation and highlights that the issue is largely to do with the Cross Boundary Study (CBS) falling significantly behind schedule. SESplan could not have undertaken a more detailed appraisal as the CBS was not available. However, the current appraisal is still sufficient to allow the Joint Committee to submit the Proposed Plan for examination as the appraisal indicates that the additional transport impacts as a result of Proposed Plan content will be minimal at a regional scale in comparison to previous plans. There will be more acute impacts within Edinburgh but these cannot be identified in detail until sites for housing are identified in the subsequent Edinburgh LDP preparation process. Further analysis of mitigation options can be undertaken when the CBS is available.

2.30 Many representations to Funding Transport Infrastructure were largely supportive of the approach to a Cross Boundary Transport Contributions Framework but sought assurances that it would comply with regulations relating to planning obligations and would not impact on development viability.

- 2.31 Overall no representations have been received which would require a change to the Proposed Plan's strategy and / or themes around the Vision, the Spatial Strategy, a Place to do Business, a Place for Communities and a Better Connected Place. It is therefore recommended that no modifications are made to the Proposed Plan.
- 2.32 Paragraph 12.2 of the SESplan Constitution states '*All major decisions, for example about the content of the Strategic Development Plan, but with the exception of submission of the Proposed Plan to Scottish Ministers when no Modifications are proposed, will require to be ratified by each of the six constituent member authorities.*' Paragraph 2.5 of the Scheme of Delegation also states '*At the stage of submitting the Proposed Plan to Scottish Ministers the Joint Committee can decide, following consideration of representations received during the statutory period for representations, to submit the Proposed Plan without making any modifications. In addition to those functions listed at 2.3 above, where, and only where, the Joint Committee decide to make no changes, then the Joint Committee is authorised under delegated authority to submit the Proposed Plan and Summary of Unresolved Issues directly to Scottish Ministers without requiring the decision to be ratified by the Member Councils.*'
- 2.33 The Joint Committee is asked to note the representations received, approve the Strategic Development Plan Authority's response to the representations received, agree that no modifications should be made to the Proposed Plan in response to these representations and approve the unmodified Proposed Plan for submission to Scottish Ministers, by no later than the 27 June 2017, for Examination.

### **3. Submission to Scottish Ministers for Examination**

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3.1 Paragraph 46 of Circular 6/2013 Development Planning sets out the requirements for the submission of the Proposed Plan to Scottish Ministers in accordance with Section 10(3) of the Planning etc. (Scotland) Act 2006. This requires the Strategic Development Plan Authority to submit the following along with the Proposed Plan:

- A report as to how far the Strategic Development Plan Authority has conformed with the commitments made regarding consultation and public involvement in their current Participation Statement;
- The Action Programme;
- A summary of unresolved Issues;
- Copies of the unresolved representations;

- The Environmental Report; and
- The Monitoring Statement.

3.2 Following approval by Joint Committee, the package of information to be submitted alongside the Proposed Plan (the Submission Package) will be collated. This will involve a complex administration process whereby a hard and electronic copy of all Schedule 4s with copies of all relevant representations, the documents set out above and all supporting documents are collated, cross referenced and highlighted as appropriate. This process is anticipated to take around 10 weeks with final submission to Scottish Ministers anticipated for the beginning of June and no later than the 27 June 2017.

3.3 Paragraph 47 of Circular 6/2013 Development Plan requires publication of a notice in at least one local newspaper and on the internet, stating:

- That the Proposed Plan has been submitted to Scottish Ministers;
- The date of the submission; and
- Details of when and where the Plan may be inspected (including on the internet);

3.4 Notice is also required to be given to the key agencies and people who submitted representations on the plan with a copy of the submitted plan made available for inspection in planning offices, public libraries and on the internet.

#### **4. Next Steps to Approval**

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4.1 The Proposed Plan is anticipated to be submitted no later than the 27 June 2017. Following this, the Directorate of Planning and Environmental Appeals (DPEA) will appoint a Reporter(s). The Report of Conformity with the Participation Statement will then be considered. Subject to the Report of Conformity being approved, the Examination will formally commence.

4.2 An indicative timeline for the Examination is set out within Development Plan Scheme 9 (See Item 3 – Development Plan Scheme 9). As set out in more detail under Item 3, it is anticipated that the Examination will formally commence in Mid July, with the Report of Examination expected in early March 2018. On this basis, it is estimated that Strategic Development Plan 2 will be approved around May 2018.

- 4.3 An update on the submission of the Proposed Plan and examination will be provided at the next meeting of the Joint Committee.

## **Appendices**

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- 1 Summary of Unresolved Issues
- 2 Report of Conformity with the Participation Statement

## **Report Contact**

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Alice Miles, Acting SDP Manager

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## **Appendix 1 – Summary of Unresolved Issues**

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Issue 1 – The Vision

Issue 2.1 – The Spatial Strategy

Issue 2.2 – Green Belt and Related Designations

Issue 2.3 – Brownfield Land

Issue 2.4 – Prime Agricultural Land

Issue 2.5 – Key Area of Change South East

Issue 2.6 – Key Area of Change Edinburgh and West

Issue 2.7 – Key Area of Change Fife

Issue 2.8 – Key Area of Change Scottish Borders

Issue 3 – Placemaking Principles

Issue 4.1 – Investment and Employment

Issue 4.2 – Rural Economy

Issue 5 – Responsible Resource Extraction

Issue 6 – Zero Waste

Issue 7 – A Low Carbon Economy

Issue 8 – Increasing Housing Delivery

Issue 9 – 2018 – 2030 Period and Five Year Land Supply

Issue 10 – Affordable and Specialist Housing

Issue 11 – Thriving Town Centres

Issue 12 – Enhanced Green Networks

Issue 13 – Supporting Non Car Travel

Issue 14 – Strategic Transport Improvements

Issue 15 – Funding Transport Infrastructure

Issue 16 – Other Infrastructure

Issue 17 – Other Issues

<b>Issue 01</b>	<b>The Vision</b>	
<b>Development Plan reference:</b>	<b>The Vision</b> (pages 6 – 9) paragraphs 2.1 – 2.4	<b>Reporter:</b> [Note: For DPEA use only.]
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Cala Management Ltd. (929806) Cockburn Association (037249) Edinburgh Association of Community Councils (040476) Edinburgh BioQuarter Partners (037370) Forth Ports Ltd (929573) Grange and Prestonfield Community Council (790304) Mr Jon Grounell (786916) H & H Group PLC (927998) Homes for Scotland (040551) Mactaggart & Mickel Homes (038949) Mrs Mirabelle Maslin (928549) Midlothian Green Party (778339) Moorfoot Community Council (906008) Murray Estates (930087) Near na Gaoithe Wind Ltd. (034699) Mrs Constance Newbould (034296) North Berwick Community Council (035522)	Peebles Community Trust (810911) Persimmon Homes (040349) RSPB Scotland (031480) Scottish Government (034404) Scottish Natural Heritage (790587) Scottish Power Generation (034698) Scottish Wildlife Trust (038549) Shawfair LLP (039940) Shepherd Offshore (Scotland) Ltd (038954) SP Energy Networks (034701) Stewart Milne Homes (930082) Taylor Wimpey and Barratt Homes (040609) Taylor Wimpey/Hallam Land Management (039250) TH Real Estate (035989) Wallace Land Investment & Management (930071)	
<b>Provision of the Development Plan to which the issue relates:</b>	The City Region Vision for 2038 and its delivery.	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Cala Management Ltd. (929806)</u>  Insufficient attention paid to the potential and financial importance of a City Region Deal in helping deliver infrastructure.</p> <p><u>Cockburn Association (037249)</u>  The Vision is flawed, unbalanced and not holistic. Acknowledges the challenge of creating a vision which is appropriate for all member authorities. Suggests replacing the Vision in the Proposed Plan with an amended version of the Vision contained in the Main Issues Report.</p> <p><u>Edinburgh Association of Community Councils (040476)</u>  Vision statement is too generic and not specific to the SESplan area. It could benefit from inclusion of unique historic character of Edinburgh and its</p>		

surroundings. Line 4 of The Vision should be modified to remove reference to economic growth, as it may prevent some other aims of the Vision from being realised.

Edinburgh BioQuarter Partners (037370)

The Vision should be modified to make more specific reference to Edinburgh's role in driving successful economic growth of the City Region. Cautions against over-reliance on a City Deal in outlining ambitions for growth in the city region.

Forth Ports Ltd (929573)

The City Region Assets infographic should be modified to reflect NPF3 and the broad range of port related opportunities in the City Region. The proposed vision does not sufficiently recognise the assets of the region. The Vision should also be modified to better reflect the impact of the City Region beyond its boundaries.

Grange and Prestonfield Community Council (790304)

The Vision statement is not sufficiently specific to the SESplan area and makes no reference to the unique character of Edinburgh and its surroundings. Suggests that economic growth may conflict with the other aims of the vision and that reference to continued economic growth should therefore be deleted from the vision statement.

Mr Jon Grounsell (786916)

Does not support the priority given to Green Networks in the Proposed Plan. Landscape as a general theme does not receive sufficient attention throughout the Proposed Plan.

H & H Group PLC (927998)

Support for the general ethos of the Vision. However, housing and infrastructure provision should be addressed in greater detail by the proposed plan and should not be left to the City Region Deal. Vision is not sufficiently ambitious with regard to housing targets or at addressing housing shortfall.

Homes for Scotland (040551)

The Vision is positive, but does not contain suitably robust ambitions or targets for future growth of the City Region, and should make more specific reference to the role the South East Scotland City Region as the driver of sustainable economic growth for Scotland. The Vision should be revised to contain targets and should also include an executive summary of the spatial strategy. The Proposed Plan also generally lacks ambition.

Mactaggart & Mickel Homes (038949), Shawfair LLP (039940), Shepherd Offshore (Scotland) Ltd (038954)

New public / private funding models referred to in the SDP Housing Background Paper (October 2016) should be adopted by SDP2.

Mrs Mirabelle Maslin (928549)

Parts of the Vision are overly aspirational instead of being realistic / achievable. The Proposed Plan makes insufficient reference to education and medical services in respect of new development. Plan review periods should have the option of

slowing or halting development. Questions how best to ensure essential infrastructure is delivered, and how contributions for roads, schools and green space will be upheld.

Midlothian Green Party (778339)

Supports the Vision for the city region, but expresses doubts over the deliverability of the vision. In particular, there is insufficient detail in the Proposed Plan to show how inequality and deprivation will be reduced. Questions whether impact of the city region deal could potentially overtake the Proposed Plan in terms of economic growth, and this could lead to increased strain on existing land supply, transport, public infrastructure and the environment. Questions whether SESplan has adequately taken into account other competing visions within the plan area.

Moorfoot Community Council (906008)

Support for the principles of the Vision, but concern about deliverability of some of the goals identified by the Vision.

Murray Estates (930087)

The Proposed Plan's targets for housing and land supply are below predicted levels of demand. Housing supply targets should either be amended, or the Vision of the Proposed Plan should be amended to present a more accurate reflection of housing demand.

Neart na Gaoithe Wind Ltd. (034699)

Proposed Plan and the Vision do not adequately reference National Planning Policy, particularly National Planning Framework 3.

Mrs Constance Newbould (034296)

The Vision does not adequately represent a broad range of communities, and the views of some communities are being ignored.

North Berwick Community Council (035522)

The Vision is good, but would benefit from specific reference to maintain local character and distinctiveness and the towns and villages of East Lothian.

Peebles Community Trust (810911)

Strong support for the Vision statement and welcomes inclusion of the following terms: "well designed"; "afford a home in a place near where they work"; and "more people are cycling and walking to work". Also seeks inclusion of a statement that more explicitly recognises the essential inter-dependence of the centre and peripheral communities, and reference to the need for economically thriving peripheral / rural communities / settlements.

Persimmon Homes (040349)

The Proposed Plan's targets for housing and land supply are below predicted levels of demand, and this conflicts with the vision's aim of more people being able to afford a home in a place near where they work. Housing supply targets should either be amended, or the Vision of the plan should be amended to present a more accurate reflection of housing demand.

RSPB Scotland (031480)

The Vision does not make reference to the enhancement of the natural environment, nor Green Networks. Supporting and enhancing biodiversity and the provision of green space are vital for sustainable growth and these should be integral parts of the Vision. Important to consider the environmental impacts of a City Region Deal.

Scottish Government (034404)

Support for the City Deal and highlights the need for consistency between Proposed Plan and the City Deal, particularly in relation to strategic priorities and their delivery.

Scottish Natural Heritage (790587)

The Proposed Plan should make a clear reference to the interconnectivity of land and marine planning. This could be achieved by a minor modification of the City Region Vision.

Scottish Power Generation (034698), SP Energy Networks (034701)

Proposed Plan does not show sufficient evidence of a review of planning policy, particularly National Planning Policy and more specifically NPF3. Calls for significant revisions, including modification to the Vision, and inclusion of reference to relevant National Planning Policy (including NPF3) throughout the Proposed Plan.

Scottish Wildlife Trust (038549)

Amend the Vision to include reference to green infrastructure and biodiversity.

Stewart Milne Homes (930082), Taylor Wimpey and Barratt Homes (040609)

The Proposed Plan's targets for housing and land supply are below predicted levels of demand, and this conflicts with the Vision's aim of more people being able to afford a home in a place near where they work. Housing supply targets should either be amended, or the Vision of the plan should be amended to present a more accurate reflection of housing demand.

Taylor Wimpey/Hallam Land Management (039250)

General support noted for the City Region Vision, but seeks that the Vision is modified to make specific reference to the City of Edinburgh being the focus for sustainable growth within the SESplan area.

TH Real Estate (035989)

Supports the Vision section of the Proposed Plan; however, the Vision within the 2015 Main Issues Report contained reference to the region being recognised at an International level for investment and business development, and this aspiration should be continued into the Proposed Plan.

Wallace Land Investment & Management (930071)

The City Region Deal does not contain suitably robust ambitions or targets for future growth of the City Region. City Region Vision doesn't contain targets for housing delivery. Proposed plan does not have enough focus on longer term actions (beyond 2024). SESplan Action Plan does not clearly set out what needs

to be done to deliver the Vision.

**Modifications sought by those submitting representations:**

Cala Management Ltd. (929806)

Paragraphs 2.1 and 2.2 (Delivering the Vision) should be amended to clearly set out policies and proposals and identify a fully worked up cost plan setting out infrastructure costing and funding streams for delivery. Paragraphs 2.3 and 2.4 (City Region Deal) should be altered to make reference to potential and financial importance of a City Deal in delivering infrastructure.

Cockburn Association (037249)

Replace existing Vision with the following: 'The south east Scotland region is a thriving, successful area in which all forms of deprivation and inequality have been reduced; climate change ambitions have been exceeded; and is internationally recognised as outstanding for its cultural and landscape value and as an area to live, work and do business. We will build on the strengths of all parts of the region and identify opportunities for growth and sustainable development, based on high quality design. This will not endanger the natural and built environment and will also conserve and enhance their values.'

Edinburgh Association of Community Councils ( 040476), Grange and Prestonfield Community Council (790304)

Line 4 of The Vision should be modified to remove reference to economic growth, to read as follows:

'Sustainable growth has been achieved by carefully managing those assets that provide the most benefits and by making well designed, successful places where people can thrive. More people are able to afford a home in a place near where they work. A series of cross-boundary transport projects has made travel by public transport easier and more people are cycling and walking to work. ~~The economy continues to grow and~~ The region remains an outstanding place to live, work and visit. Communities in the region are healthier and there is less inequality and deprivation.'

Edinburgh BioQuarter Partners (037370)

Modify penultimate sentence of the Vision to read as follows: 'Edinburgh continues to fuel the growth of the economy across the city region and the region remains an outstanding place to live, work and visit.'

Modify second sentence of paragraph 2.4 to read as follows:

'However, taking into account the potential opportunities, this plan includes ambitious economic growth, housing targets and a generous housing land requirement.'

Forth Ports Ltd (929573)

City Region Assets Infographic: Delete 'Rosyth large freight handling capacity' and replace with 'Additional Freight Handling Capacity on the Forth and other port related opportunities'.

Modify City Region Vision to read as follows: 'Sustainable growth has been

achieved by carefully managing and enhancing those assets that provide the most benefits and by making well designed, successful places where people can thrive. More people are able to afford a home in a place near where they work. A series of cross-boundary transport projects has made travel by public transport easier and more people are cycling and walking to work. The economy continues to grow and the region is globally well connected and remains an outstanding place to live, work and visit. Communities in the region are healthier and there is less inequality and deprivation'.□

Mr Jon Grounsell (786916)

Modify the Vision to emphasise landscape (rather than Green Networks) as a driver of the spatial Vision.

H & H Group PLC (927998)

Modify the Vision to include more specific guidance on how and where housing needs will be met along with guidance on infrastructure provision.

Homes for Scotland (040551)

The City Region Vision should be modified to contain targets. The Vision should also include an executive summary of the Spatial Strategy, to help provide guidance on delivery of infrastructure.

Paragraph 2.1 (Delivering the Vision) should be replaced to clearly outline how targets for growth will be delivered through the spatial strategy and policy framework.

Existing policy framework of 15 policies contained within SDP1 should be carried over into Section 2 of the Proposed Plan, Delivering the Vision.

Insert 2 additional bullet points at paragraph 2.2 to outline:

- i. a requirement for more longer term actions (beyond 2024);
- ii. requirement for input and coordination of infrastructure providers (such as Scottish Water) SESplan Action Programme requires further development, particularly in relation to longer term period.

Mactaggart & Mickel Homes (038949), Shawfair LLP (039940), Shepherd Offshore (Scotland) Ltd (038954)

Amend existing Vision to include public / private funding models referred to in the SDP Housing Background Paper (October 2016).

Murray Estates (930087)

Amend the Vision (page 6) to read as follows: 'Some growth has been achieved by carefully managing those assets that provide the most benefits and by making well designed, successful places where people can thrive. However, less people are able to afford a home in a place near where they work. A series of cross-boundary transport projects has made travel by public transport easier and more people are cycling and walking to work. The economy continues to grow and the region remains an outstanding place to live, work and visit, but there will not be enough housing to meet predicted needs'.

Paragraph 2.4 should also be modified to delete references to the Plan including ambitious housing targets and a generous housing requirement.

Neart na Gaoithe Wind Ltd. (034699)

Modify the plan as follows:

1. Include a policy review to clearly set out the role of SESplan within the wider planning policy context;
2. Modify the Vision for the City Region to include more specific recognition of infrastructure requirements for the area, and its role in helping to deliver the national vision of NPF3;
3. Subsequent sections of SESplan should be reviewed where necessary to suitably reference national planning policy as the basis for the vision and to reflect the role of SESplan within planning policy hierarchy.

Mrs Constance Newbould (034296)

No modification specified, but representation infers more extensive engagement with a broader range of communities is required.

North Berwick Community Council (035522)

No modification specified, representation indicates the Vision is good, but should include specific reference to the need to maintain local character and distinctiveness in the towns and villages of East Lothian.

Peebles Community Trust (810911)

Modify the Vision statement (page 6) to add a statement which recognises interdependence of the centre and peripheral communities, including the need for peripheral communities and settlements to also thrive.

Persimmon Homes (040349)

If housing figures are not revised, then amend the Vision to read as follows: 'Some Growth has been achieved by carefully managing those assets that provide the most benefits and by making well designed, successful places where people can thrive. However, less people are able to afford a home in a place near where they work. A series of cross-boundary transport projects has made travel by public transport easier and more people are cycling and walking to work. The economy continues to grow and the region remains an outstanding place to live, work and visit, but there will not be enough housing to meet predicted needs'.

Paragraph 2.4 should also be modified to remove references to the Plan including ambitious housing targets and a generous housing requirement.

RSPB Scotland (031480)

Modify existing Vision statement to read as follows:

"Sustainable growth has been achieved by carefully managing those assets that provide the most benefits and by making well-designed, successful places where people can thrive. More people are able to afford a home in a place near where they work. A series of cross-boundary transport projects has made travel by public transport easier and more people are cycling and walking to work. The economy continues to grow and the region remains an outstanding place to live, work and visit. The natural environment has been protected and enhanced to benefit wildlife and people through Green Networks and other measures. Increased access to green space results in communities in the region being healthier with associated less inequality and deprivation."

Add new line to end of paragraph 2.4 to read as follows:

"The impact of the City Region Deal on the pace of economic growth, and any consequent impacts on the amount of development land required will be considered in relation to subsequent plans and strategies related to infrastructure delivery. Potential environmental impacts will also be considered as part of Strategic Environmental Assessment and Habitat Regulations Assessment processes prior to the adoption of these plans or strategies."

Scottish Government (034404)

City Region Deal, paragraph 2.3, second line: Replace 'This is a deal between the Scottish Government, UK Government and SESplan member authorities that allows greater fiscal autonomy on the basis of an investment programme that demonstrates additional economic growth' with 'SESplan member authorities are working with the Scottish Government and UK Government to develop proposals which will unlock investment and secure and grow the regional economy'.

Scottish Natural Heritage (790587)

No modification is specified, but indicates Vision should be modified to include reference to marine planning.

Scottish Power Generation (034698)

Modify the proposed plan as follows:

1. Include a policy review to clearly set out the role of SESplan within the wider planning policy context;
2. Include clearer reference to NPF3, in particular:
  - (i) National Development number 3;
  - (ii) commentary on potential aspirations for the Cockenzie site; and
  - (iii) the Cockenzie to Torness Area of Coordinated Action;
3. Modify the vision for the City Region to include more specific recognition of infrastructure requirements for the area, and its role in helping to deliver the national vision of NPF3;
4. Subsequent sections of SESplan should be reviewed where necessary to suitably reference national planning policy as the basis for the vision and to reflect the role of SESplan within planning policy hierarchy.

Scottish Wildlife Trust (038549)

Modify existing Vision to read as follows: "Sustainable growth has been achieved by carefully managing those assets that provide the most benefits and by making well designed, successful places where people can thrive. More people are able to afford a home in a place near where they work. A series of cross-boundary transport projects has made travel by public transport easier and more people are cycling and walking to work. The economy continues to grow and the region remains an outstanding place to live, work and visit. Strategic planning of green and blue infrastructure has helped reverse biodiversity decline, reduced the worst impacts of climate change and improved access to nature for all. Communities in the region are healthier and there is less inequality and deprivation."

Modify paragraph 2.1 to delete 'Development should...' in favour of 'Development must...'

Modify paragraph 2.2 to include reference green and blue infrastructure within cross boundary infrastructure.

SP Energy Networks (034701)

Modify the proposed plan as follows:

1. Include a policy review to clearly set out the role of SESplan within the wider planning policy context;
2. Modify the Vision for the City Region to include more specific recognition of infrastructure requirements for the area, and its role in helping to deliver the national vision of NPF3;
3. Subsequent sections of SESplan should be reviewed where necessary to suitably reference national planning policy as the basis for the vision and to reflect the role of SESplan within planning policy hierarchy.

Stewart Milne Homes (930082), Taylor Wimpey and Barratt Homes (040609)

If housing figures are not revised, then amend the Vision to read as follows: 'Some growth has been achieved by carefully managing those assets that provide the most benefits and by making well designed, successful places where people can thrive. However, less people are able to afford a home in a place near where they work. A series of cross-boundary transport projects has made travel by public transport easier and more people are cycling and walking to work. The economy continues to grow and the region remains an outstanding place to live, work and visit, but there will not be enough housing to meet predicted needs'.

Paragraph 2.4 should also be modified to remove references to the Plan including ambitious housing targets and a generous housing requirement.

Taylor Wimpey/Hallam Land Management (039250)

Modify the Vision statement to add specific reference to the City of Edinburgh being the focus for sustainable growth within the SESplan area.

TH Real Estate (035989)

No modification specified, but indicates reference of the region attracting investment at an international level should be added to the Vision.

Wallace Land Investment & Management (930071)

The City Region Vision should be modified to contain targets. The Vision should also include an executive summary of the spatial strategy, to help provide guidance on delivery of infrastructure.

Paragraph 2.1 should be replaced to outline how targets will be delivered.

Existing policy framework of 15 policies contained within SDP1 should be carried over into section 2 of the proposed plan - Delivering the Vision.

Insert 2 additional bullet points at paragraph 2.2 to outline:

- i. a requirement for more longer term actions (beyond 2024);
- ii. requirement for input and coordination of infrastructure providers (such as Scottish Water).

Representation also suggests halting SDP2 until a City Region Deal has been approved.

## Summary of responses (including reasons) by Planning Authority:

### **Vision Statement**

Cockburn Association (037249), TH Real Estate (035989)

The Vision contained in the Main Issues Report was modified by SESplan to take into account a number of consultation responses, which has led to its replacement with the existing Vision statement. **No modification proposed.**

Edinburgh Association of Community Councils (040476), Grange and Prestonfield Community Council (790304)

Disagree with proposed modification. Economic growth is a fundamental element of the plan.

The Vision statement is intended to be a broad statement which sets out the overarching objectives of the whole Proposed Plan area. Place specific references are more appropriate in the Spatial Strategy section of the Plan, not the Vision. **No modification proposed.**

Edinburgh Association of Community Councils (040476), Forth Ports Ltd (929573), Grange and Prestonfield Community Council (790304), Taylor Wimpey/Hallam Land Management (039250), TH Real Estate (035989)

**The Vision statement of the Proposed Plan is not required to make specific place references. No modification proposed.**

Edinburgh BioQuarter Partners (037370), Taylor Wimpey/Hallam Land Management (039250)

Disagree with proposed modification. The Spatial Strategy section of the Proposed Plan, including Strategic Growth Areas and Key Areas of Change, contains clear detail on development patterns and areas identified for growth and investment, and identifies Edinburgh and its surroundings as the focus for most growth. Para 3.1 of the Spatial Strategy section of the Proposed Plan clearly states that 'Over the next 20 years, most growth will be focussed in and around Edinburgh.' **No modification proposed.**

Forth Ports Ltd (929573)

Disagree with proposed modification to City Region Assets Infographic (page 5). The Spatial Strategy gives clear direction on areas allocated for growth and locations for investment, including areas of Strategic Growth 2018-2030 and Forth Coast Clusters. Table 4.1 Significant Business Clusters also clearly outlines the range of opportunities at Forth Coast Cluster locations. **No modification proposed.**

Disagree with modification to City Region Vision. Enhancing plan assets is referenced throughout the plan, including the Spatial Strategy, Placemaking Principles, and Enhanced Green Networks. **No modification proposed.**

Mr Jon Grounsell (786916)

Disagree with proposed modification. The Vision statement is intended to be a broad statement which sets out the overarching objectives of the whole Proposed Plan area. Landscape is dealt with elsewhere in the Proposed Plan, including

Table 3.1 Placemaking Principles and Enhanced Green Networks (paras 5.17 – 5.21). **No modification proposed.**

H&H Group (927998)

Disagree with proposed modification. The Vision is intended to set out the overarching objectives of the Proposed Plan. Housing delivery is expanded in section 5 of the plan. Specifically, Figure 5.1 Distribution of SESplan Housing Target (page 42) and Table 5.1 Housing Supply Targets clearly outline where housing needs will be met. The plan makes commitment to a number of strategic infrastructure improvements and further information is contained in the Action Plan which will be updated every two years. The plan also makes a number of clear directions to member authorities on developer infrastructure and on Funding Transport Infrastructure. **No modification proposed.**

Murray Estates (930087), Persimmon Homes (040349), Stewart Milne Homes (930082), Taylor Wimpey and Barrat Homes (040609)

Disagree with proposed modification. The Vision is intended to set out the overarching objectives of the proposed plan, and the proposed modification is not in line with these objectives. **No modification proposed.**

Neart na Gaoithe Wind Ltd. (034699), Scottish Power Generation (034698), SP Energy Networks (034701)

1. The proposed plan has been prepared in line with National and Scottish Planning Policy and a policy review was undertaken during production of the plan. It is not considered necessary to incorporate a policy review into the plan document.

2. SESplan is intended to be a concise, visionary, map based document. The Vision statement is intended to set out the broad objectives for the plan area. SESplan acknowledges the challenge of ensuring infrastructure is delivered and the proposed plan is reflective of the vision of NPF3. However, infrastructure is explored elsewhere in the plan, and is also supported by the Action Programme, which will be updated every two years.

3. SESplan's role within the planning hierarchy is clearly defined by Scottish Planning Policy and NPF3. Disagree with proposed modification to the plan to add further reference to how SESplan sits in the planning policy hierarchy. **No modification proposed.**

North Berwick Community Council (035522)

Disagree with proposed modification. The Vision is intended to set out the overarching objectives of the Proposed Plan for the entire plan area and it is not appropriate to make reference to specific towns and villages. Spatial Strategy contains greater place specific detail at local level. The Spatial Strategy and Placemaking Principles sections of the Proposed Plan contains specific provisions for maintaining character, landscape setting and distinctive identity of existing and proposed settlements. **No modification proposed.**

Peebles Community Trust (810911)

Disagree with proposed modification. The Vision statement is intended to apply to the entire plan area. The Spatial Strategy section of the plan, including Strategic Growth Areas, Rural Growth Areas, Long Term Growth Corridors and Key Areas of

Change is considered to be the appropriate section of the plan to outline the patterns and directions of growth across the SESplan area, including spatial relationships between urban and rural communities. **No modification proposed.**

RSPB Scotland (031480)

Disagree with proposed modification. The natural environment is dealt with elsewhere in the plan, including the Spatial Strategy, and Enhanced Green Networks sections. **No modification proposed.**

Scottish Natural Heritage (790587)

Disagree with proposed modification. The Vision statement is intended to set out the broad objectives for the plan area. The Proposed Plan reflects NPF and SPP. It is not the purpose of SDP2 to repeat policy context or policies and legislation from elsewhere. **No modification proposed.**

Scottish Power Generation (034698), SP Energy Networks (034701)

Disagree with proposal to modify the proposed plan as follows:

1. The proposed plan has been prepared in line with National and Scottish Planning Policy and a policy review was undertaken during production of the plan. It is not considered this should be incorporated into the plan document.
2. SESplan is intended to be a concise, visionary, map based document, and has not been designed to contain a policy review; however, this does not mean the plan has not been prepared in line with National and Scottish Planning policy and the proposed plan does align with NPF3. Cockenzie has been identified in the plan as a Forth Coast Cluster, and text in the plan makes clear reference to a range of potential opportunities at this site. In terms of Forth Coast Cluster locations, Table 4.1 Significant Business Clusters states: 'In particular, port use such as renewables manufacturing and servicing, thermal and low carbon energy generation or other uses associated with an Area of Coordinated Action. These locations also present significant opportunities for innovative reuse and regeneration, making use of the well serviced sites and their coastal locations. Subject to a review of the National Planning Framework, locations at the former Longannet and Cockenzie power station sites may have potential for a wider range of uses.' This expands on text in paragraph 3.16 Key Areas of Change South East in relation to the former Cockenzie Power Station site.
3. SESplan acknowledge the challenge of ensuring infrastructure is delivered and the proposed plan is reflective of the vision of NPF3. However, infrastructure is explored elsewhere in the plan, and is also supported by the Action Programme, which will be updated every two years.
4. SESplan's role within the planning hierarchy is clearly defined by Scottish Planning Policy and NPF3. Disagree with proposed modification to the plan to add further reference to how SESplan sits in the planning policy hierarchy. **No modifications proposed.**

Scottish Wildlife Trust (038549)

Disagree with proposed modifications. The Enhanced Green Networks section of the plan (paragraphs 5.17 – 5.21) and Figure 5.2 (Strategic Green Network Priority Areas) gives full consideration of green networks and green and blue infrastructure. It also outlines that SESplan will prepare strategic Frameworks for Cross Boundary Green Network Priority Areas in Edinburgh and West and Edinburgh and East, and

directs that SESplan member authorities will prepare non-statutory frameworks for Green Network Priority Areas and incorporate these into LDPs at the earliest opportunity. In relation to use of 'Development should' vs 'Development must' (paragraph 2.1) the SDPA will determine which is appropriate when providing direction to member authorities. **No modification proposed.**

TH Real Estate (035989)

Disagree with proposed modification. Proposed Plan's Spatial Strategy and A Place to do Business detail development patterns, including areas identified for growth and locations for investment. **No modification proposed.**

Wallace Land Investment & Management (930071), Homes for Scotland (040551)

Disagree with proposed modification. The Vision statement sets out the overarching objectives for the Proposed Plan and is not intended to contain targets. **No modification proposed.**

**Delivering the Vision**

Cala Management Ltd. (929806), Homes for Scotland (040551), Wallace Land Investment & Management (930071)

Disagree with proposed modification. The Vision statement sets out the overarching objectives for the Proposed Plan and is not intended to contain targets. Disagree with requirement to introduce an executive summary of the Spatial Strategy into the Vision of Proposed Plan. Paragraph 2.2 clearly outlines the role of the SESplan Action Programme and associated action programmes which will be central to the delivery of this plan. **No modification proposed.**

Homes for Scotland (040551), Wallace Land Investment & Management (930071)

Disagree with modification in relation to continuing use of policy framework of 15 policies contained within SDP1. The Proposed Plan has made a deliberate shift away from the 15 policies contained in SDP1. This was an intentional move to make SDP2 more accessible and give the entire document greater relevance. Decision makers must have regard to all provisions of the Plan, not just named policies. Clear, specific directions to member authorities and Local Development Plans have been highlighted throughout the plan in bold in the interests of clarity. **No modification proposed.**

Disagree with proposal to insert 2 additional bullet points at paragraph 2.2. The SESplan Action Programme will be subject to regular review and will be updated every 2 years. SESplan consider the Action Programme and LDP action programmes to be the most appropriate place to outline co-ordination of infrastructure providers. **No modification proposed.**

**City Region Deal**

Cala Management Ltd. (929806)

Disagree with proposed modification. SESplan considers it is too early to assess the impact of a City Region Deal, its impact on the economy and potential for infrastructure provision. **No modification proposed.**

Edinburgh BioQuarter Partners (037370)

Disagree with proposed modification. Economic growth is a core part of the City

Region Vision, and is also dealt with in greater detail in the Spatial Strategy and A Place to do Business of the Proposed Plan.

In relation to a City Region Deal, paragraph 2.4 of the Proposed Plan clearly states 'It is too early to predict the impact of this potential new investment on the economy of the region or the extent to which economic growth may affect housing demand.'

**No modification proposed.**

Mactaggart & Mickel Homes (038949), Shawfair LLP (039940), Shepherd Offshore (Scotland) Ltd (038954)

Disagree with proposed modification. Paragraph 2.4 of the Proposed Plan clearly states that it is too early to predict the impact of this potential new investment on the economy of the region or the extent to which economic growth may affect housing demand. Funding models and their use will evolve as appropriate in line with the ongoing evolution of the City Deal. **No modification proposed.**

Murray Estates (930087), Persimmon Homes (040349), Stewart Milne Homes (930082), Taylor Wimpey and Barratt Homes (040609)

Disagree with proposed modification. This is contrary to delivering housing which is a key objective of the Proposed Plan. **No modification proposed.**

RSPB Scotland (031480)

Disagree with proposed modification. Environmental impacts of any City Deal and associated development will be subject to their own SEA or HRA where appropriate, under the Environmental Assessment (Scotland) Act 2005 and the Conservation (Natural Habitats) Regulations 1994. **No modification proposed.**

Scottish Government (034404)

Disagree with proposed modification. Cannot see merit or added value to proposed plan in altering wording of the second line. It is considered that the existing text within paragraphs 2.3 and 2.4, including the second line of paragraph 2.3, gives an accurate description of the current position in respect of City Region Deal. **No modification proposed.**

Wallace Land Investment & Management (930071)

Disagree that production of the plan should be halted until City Region Deal has been approved. It is too early to predict the impact of a City Region Deal, and while this has been acknowledged in the proposed plan, it is not considered reasonable to delay. SESplan have a duty to meet statutory timescales and the proposed plan has been based on the most recent and up to date information available. SESplan has a duty to submit the Proposed Plan to the Scottish Government by end of June 2017. SESplan are committed to meeting timescales and preventing unnecessary delay of the proposed plan. **No modification proposed.**

### **Infrastructure provision**

Mrs Mirabelle Maslin (928549)

Infrastructure delivery is dealt with elsewhere in the Proposed Plan and SESplan Action Programme. Development is required to deliver necessary infrastructure alongside development. Unless identified as cross boundary issues, individual authorities assess local development infrastructure requirements, including health,

education and transport. **No modification proposed.**

**Other Issues**

Mrs Constance Newbould

The consultation on the Proposed Plan met the statutory timescales as set out by the Scottish Government and it is considered that opportunities have been made throughout the process for engagement in the plan's preparation.

**No modification proposed.**

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]

<b>Issue 2.1</b>	<b>The Spatial Strategy</b>	
<b>Development Plan reference:</b>	<b>The Spatial Strategy (pages 12 – 14, paragraphs 3.1 – 3.9)</b>	<b>Reporter: [Note: For DPEA use only.]</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Aithrie Estates (032643)  Ashfield Land (038483)  Barratt and David Wilson Homes (799597)  Builyeon Farm LLP (835897)  CALA Management Ltd (929806)  A. J. C. Clark (930956)  Cockburn Association (037249)  Corstorphine Community Council (040457)  Cramond and Barnton Community Council (803443)  WS Crawford (040107)  Edinburgh Association of Community Councils (040476)  Friends of the River Almond Walkway (925870)  Grange and Prestonfield Community Council (790304)  Mr Jon Grounsell (786916)  Gullane Area Community Council (037068)  H and H Group Plc (927998)  Hallam Land Management Ltd (039805)  Hargreaves UK Services Ltd (038881)  Homes for Scotland (040551)  Juniper Green Community Council (028859)  Lammermuir Community Council (039856)  Lawfield Estate (930075)  Liberton and District Community Council (790396)</p>	<p>D and L McAuslan (040611)  Mrs Mirabelle Maslin (928549)  Midlothian Green Party (778339)  Moorfoot Community Council (906008)  Musselburgh Conservation Society (927996)  Mrs Constance Newbould (034296)  NHS Lothian Public Health and Health Policy (840024)  Park Lane (Scotland) Ltd (039990)  Prestonpans Community Council (039835)  Mrs Gail Reid (035887)  Crawford and Douglas Ritchie (040552)  Roslin and Bilston Community Council (790524)  Rural Renaissance (039402)  Scottish Environment Protection Agency (790577)  Scottish Natural Heritage (790587)  Shawfair LLP (039940)  Shepherd Offshore (Scotland) Ltd (038954)  South West Communities Forum (805601)  SP Energy Networks (034701)  Taylor Wimpey / Hallam Land (039250, 039521)  Transform Scotland (039136)  Trinity Community Council (039995)  Wallace Land and Investment (930071)  Wemyss &amp; March Estate / Socially Conscious Capital (037270)</p>	
<b>Provision of the Development Plan to which the issue relates:</b>	The Spatial Strategy for the region.	

## **Planning Authority's summary of the representation(s):**

### Aithrie Estates

Support the principle of long term growth corridors, however it is not felt that sufficient recognition has been made in the Key Diagram and Figure 3.3 as to the scale of the anticipated growth.

### Ashfield Land

Support the strategy. Cautions against over reliance on the city of Edinburgh in meeting housing needs of the wider city region. The plan should clearly acknowledge potential of accessible locations on the boundary of Edinburgh in order to increase available sites for housing.

### Barratt and David Wilson Homes

Greater flexibility should be permitted between identified strategic growth areas and longer term growth corridors. As such, either further areas of strategic growth should be highlighted on Figure 3.1 (including a wider Livingston area and supporting the new rail station at East Linton) or the strategic growth zoning should be removed from the plan to leave just the corridor growth indication. The need to extend the longer term growth areas should also be noted.

### Builyeon Farm LLP

Generally support the spatial strategy. Support West Edinburgh as an area of strategic growth subject to clarity being provided by the City of Edinburgh Council on the funding and timing of delivery of necessary schools infrastructure.

### CALA Management Ltd

Generally agree with the wording of paragraph 3.1, with the exception of the omission of the A70 corridor as it enters the City of Edinburgh Council area, however must critically examine the deliverability of Growth Corridors and prioritise infrastructure investment decisions to deliver them. Misleading for the Proposed Plan to state that the need for strategic growth will be largely met by land already identified in existing and proposed Local Development Plans (LDP) as this creates a public expectation that there is no requirement for additional land to be allocated in the next cycle of LDPs. The Proposed Plan does not meet requirement of paragraph 118 of Scottish Planning Policy.

### A. J. C. Clark

The long term growth corridors will accelerate the removal of farmland when the many advantages of dispersal, that would allow economic development to be promoted more evenly across the SESplan area, are ignored. A radical rethink is needed, building upwards not outwards.

### Cockburn Association

Rapid improvements in vehicle engine technology during the plan period could reduce carbon emissions and reduce adverse effects of commuting by car allowing flexibility in new housing locations avoiding valued greenspace. Concerned with over emphasis of growth on Edinburgh and South East Scotland. The Plan does not sufficiently address negative impacts of growth, including environmental degradation and loss of green belt land. Question the appropriateness of focussing

growth on South East Scotland rather than a more even spread of growth across Scotland.

Corstorphine Community Council

Concentration of development along major arterial routes, especially where public transport is limited, perpetuates car reliance and increases pressure on road infrastructure. It creates barriers to walking and cycling.

Cramond and Barnton Community Council, Friends of the River Almond Walkway

Do not support the Edinburgh centric strategy as it ignores the opportunities presented by the digital economy around home and remote working and the reduction in commuting as a result.

WS Crawford

Areas identified as longer term growth corridors also have potential (subject to the suitable provision of infrastructure) to deliver additional housing in the early period of the plan (2018-2030). Representation also suggests that Figure 3.1 Key Diagram (page 13) should be interpreted with a degree of flexibility to enable development in line with the wider spatial strategy of the plan.

Edinburgh Association of Community Councils, Grange and Prestonfield Community Council

Long term growth corridors must not become ribbon development, but have firmly controlled high quality defined edges which do not sprawl over adjacent open space and parkland.

Mr Jon Grounell

Do not support long term growth corridors which straddle the green belt. These lead to coalescence and loss of community identity. Building through the green belt exacerbates journey times, pushing existing communities further away from the city centre. Green belt loss would have a negative impact on growth.

Gullane Area Community Council

The strategy will fail to achieve development that contributes to sustainable development and does not therefore meet Scottish Planning Policy (SPP) paragraphs 28 and 29. Due to the lack of present and planned infrastructure and sites for commercial development it is unrealistic to envisage significant growth potential in the long term growth corridor which runs along the branch railway line from Drem to North Berwick.

H and H Group Plc

Existing LDP allocations will assist in meeting some but not all the housing requirements of the next 12 years and thus requires further analysis and consideration. Support Growth Corridors along transport networks, clarity is missing on how this will be achieved and to what level.

Hallam Land Management Ltd

Supports the strategy. Promotes the role of land at Craigiehall in potentially meeting a housing shortfall in the Edinburgh area.

Hargreaves UK Services Ltd

Agree that Edinburgh needs to play a significant role in meeting its housing requirement, and there is significant demand for additional housing in Edinburgh, however there should not be over-reliance on Edinburgh to meet the regions requirement. Accessible locations on the boundary of Edinburgh within the identified strategic growth areas and long term growth corridors provide a clear opportunity to meet some of this requirement in sustainable locations.

Homes for Scotland

Generally support the strategy, however areas identified for strategic growth during period 2018-2030 are limited to existing or proposed allocated sites in adopted or emerging LDPs, and therefore the strategy gives no indication of locations or scale of development beyond adopted or emerging LDPs. Strategic Growth Areas should have built in flexibility to allow the plan to provide for additional growth. Plan should clearly identify areas for additional growth beyond existing allocated or proposed sites.

Juniper Green Community Council

Strong objection to the growth corridor strategy. Would prefer to see Option 2 (Distributed Growth) from the Main Issues Report taken forward to the Proposed Plan.

Lammermuir Community Council

More growth needs to be focussed on smaller clusters in areas such as the Borders otherwise communities will decline. Too much weight is given to centralising in Edinburgh.

Lawfield Estate

Generally support spatial strategy however further support for strategic growth in the period 2018-2030 should be provided, given the failure to meet housing land targets for the current approved SDP. Where infrastructure solutions can be provided, areas identified as longer term growth corridors should be able to deliver housing in the period 2018-30 also. Support strategic growth along the A7 corridor. Investment in rail infrastructure within Midlothian should be maximised, with particular regard to the northern area linked to new rail stations at Eskbank, Newtongrange and Gorebridge.

Liberton and District Community Council

The strategy is probably along the right lines. The focus on reducing commuting is acceptable provided there is sufficient public transport capacity with built in trip flexibility and provision for other modes.

D and L McAuslan

Do not support the long term growth corridor that follows the A701. Development in the Midlothian long term growth corridor would require an A701 relief road which is included in Table 6.1 (Strategic Transport Improvements) as a future project.

Mrs Mirabelle Maslin

Long term growth corridors are an illusion. The integrity and capacity of roads and rail systems are not keeping pace with current development and cannot

accommodate further new developments.

Midlothian Green Party

The spatial strategy is based on significant increases in the amount of commuting to Edinburgh. This is not sustainable. The aim should be to reduce demand for travel by directing employment to areas within easy reach of housing, and vice versa.

Moorfoot Community Council

It is not clear whether the growth corridor preferred option in the Main Issues Report has been taken forward to the Proposed Plan. Concerns remain about the implications of this strategy for the amount of commuting, particularly by road, through Midlothian.

Musselburgh Conservation Society

Do not agree with the strategy. The amount of housing proposed in the plan will have detrimental effects on areas with high demand. Regeneration and investment of plan areas in decline should take priority over focusing growth and resources on areas of high housing demand.

Mrs Constance Newbould

The long term growth corridors will lead to ribbon development and are contrary to placemaking values. The corridors are mainly green belt. Housing and infrastructure should be located on brownfield sites.

NHS Lothian Public Health and Health Policy

Concerned that the required transport and community infrastructure will not be delivered in time to prevent development along the long term growth corridors becoming car-based dormitory suburbs. Existing public transport infrastructure lessens with distance from Edinburgh. Currently, the SESplan area contributes significantly to the failure to achieve external air quality standards.

Park Lane (Scotland) Ltd

Park Lane supports the strategy and Ratho is well situated to accommodate the increase in housing provision earmarked for future years, integrated and accessible with Edinburgh Airport, Newbridge and Edinburgh Park. Disagree that the need for strategic growth over the next 12 years will be largely met by land already identified in existing and proposed LDPs. Fig 3.1 (Key Diagram) minimises the potential of the M80 as a Long Term Growth Corridor. The proposed strategy is incoherent and relies on the delivery of the Edinburgh International Business Gateway. It also fails to take advantage of the proposed Gogar Station or tram extension to Newbridge.

Prestonpans Community Council

Further large scale development to the immediate East of Musselburgh should not be permitted. It should be made clear that Local Authorities, whilst guided by the SDP, must have the ability to reflect local circumstances.

Mrs Gail Reid

Cannot support any further development in Midlothian particularly in the Eskbank,

Dalkeith, Bonnyrigg, Gorebridge, Rosewell and Newtongrange. Road infrastructure, schools and doctors surgeries are severely compromised. Community identity has slowly faded. Object to long growth corridors and Borders rail cluster specifically around Midlothian. Public consultation events should be more frequent with varied times.

#### Crawford and Douglas Ritchie

There is not sufficient up to date technical evidence to underpin the spatial strategy in the proposed plan. Areas identified for strategic growth during period 2018-2030 are limited to existing or proposed allocated sites in adopted or emerging LDPs, and therefore gives no indication of locations or scale of development beyond adopted or emerging LDPs.

#### Roslin and Bilston Community Council

The spatial strategy In relation to the A701 the term long term growth corridors is misleading. The road system cannot tolerate growth in the current LDP and is not appropriate for further development. Transport corridors are unsustainable. Housing needs to be built close to sources of employment.

#### Rural Renaissance

Need for all authorities to deliver the strategy. Agree that development should be focused but allocations need to be made in recognised housing market areas and need to be realistic. Need to clarify that allocations will be made in areas where there has been historic demand.

#### Scottish Environment Protection Agency

Objects to existing Figure 3.1 Key Diagram (page 13) and Figure 3.3 Edinburgh and West (page 23) on grounds of flood risk.

#### Scottish Natural Heritage

The spatial strategy will present challenges for natural heritage, including the landscape setting of Edinburgh (and other urban areas within the city region). More clarity is needed on location, limits and form of growth envisaged from Long Term Growth Corridors 2030+ (Figure 3.1 Key Diagram, page 13).

#### Shawfair LLP

Support strategy to direct LDPs to release land, including green belt land, at locations along Long Term Growth Corridors where necessary.

#### Shepherd Offshore (Scotland) Ltd

If long term growth corridors are to be successful must bring forward the investment and actions to prepare these areas for development and infrastructure provision. SDP must direct LDPs to ensure available land in these locations is utilised in a planned and sustainable manner.

#### South West Communities Forum

Question the use of growth corridors and whether these are appropriate or will in fact cause coalescence, increased road traffic and loss of green belt land.

### SP Energy Networks

Narrow scope of infrastructure in the spatial strategy. Infrastructure can be strategic in nature without necessarily being cross border.

### Taylor Wimpey / Hallam Land

Support the identification of the Strategic Growth Area along the A701 Corridor. Paragraph 3.21 of the spatial strategy (Edinburgh and West) has the potential to deliver a range of opportunities for strategic growth, including the delivery of substantial housing developments with good transport connections. Support is also noted for paragraph 3.22 requiring City of Edinburgh LDP to safeguard land for future tram extension to Newbridge and paragraph 3.33 highlighting the need for a more plan led approach to the value of green infrastructure within and beyond the Edinburgh green belt (page 22).

### Transform Scotland

Supports the spatial strategy provided appropriate improvements to the public transport services are implemented to meet demand and encourage modal shift away from the private car.

### Trinity Community Council

Agree with the spatial strategy. Concerned as to the compatibility of creating a green network between the City Centre and the Forth Coast while at the same time promoting it for strategic housing and commercial growth.

### Wallace Land and Investment

Spatial strategy does not explain how the Strategic Growth 2018-2030 will occur. Necessary infrastructure planning should be part of the Proposed Plan. There is no explanation of how the Long Term Growth Corridors will be established in the lead-in up to 2030, particularly in the provision of necessary infrastructure in advance of 2030. There is no technical evidence to support the spatial strategy. Difficult to ascertain if any new strategic growth is being proposed in the locations identified in Figure 3.1. Anticipated that development on some allocated sites in the adopted and emerging LDPs will be well underway by the end of the approved SDP period to 2024, further consideration needs to be given to the ability of these areas to accommodate further development. Propose the following areas should be prioritised - M9 Corridor, M8 Corridor, South West Edinburgh, South Edinburgh, South East Edinburgh, Central Edinburgh, A7 / A68 / Borders Rail Corridor, A701 Corridor, East Lothian West, East Lothian Central, East Lothian East. It is not evident how the transport corridors for the Strategic Growth 2018-2030 have been selected which then morph into the Long Term Growth Corridors. Evident from Figure 3.1 that the Long Term Growth Corridors in Edinburgh and West are not based on all available public transport corridors it is therefore unduly restrictive. All rail corridors should be included in Figure 3.1 as sustainable locations for future growth. The location or scale of future growth for the period up to 2038 should be clarified, explaining the priority areas in each LDP required to meet housing requirement.

### Wemyss & March Estate / Socially Conscious Capital

Support spatial strategy and consider additional housing of a strategic scale at Longniddry South to be in accordance with strategy.

**Modifications sought by those submitting representations:**

Aithrie Estates (459)

Alter Figure 3.1 by expanding the boundary of growth to the west and south of Winchburgh. (Illustration provided).

Ashfield Land (543)

Modify spatial strategy to safeguard against an over reliance on City of Edinburgh at meeting the housing needs of the wider region. The plan should also clearly acknowledge potential of accessible locations on the boundary of Edinburgh in order to identify a range of sites and alleviate any shortfall in housing land.

Barratt and David Wilson Homes (631)

Add new sentence after second sentence in paragraph 3.3: Where infrastructure solutions can be provided, longer term growth corridors should be extended and also provide for additional strategic growth options in the 2018-30 period. Figures 3.1 and 3.2 - Identify East Linton for Strategic Growth 2018-30.

CALA Management Ltd

Identify A70 transport corridor in Edinburgh as a strategic growth area 2018 - 2030 and beyond in Diagrams 3.1 and 3.3 and Key Areas of Change paragraphs 3.19 - 3.23. (Diagram 3.1, paragraphs 3.19-3.23).

Cockburn Association

Paragraph 4.24 Include a statement to monitor improvements in vehicle emissions and its related opportunities for more flexible options to locate housing land.

Cramond and Barnton Community Council, Friends of the River Almond Walkway

No modification is specified, representation indicates that the focus of the strategy on Edinburgh should be reduced and that opportunities for new villages and towns with good digital communications around the Region should be investigated. This would thereby reduce commuting to / within Edinburgh and retain / improve the quality of life of Edinburgh's citizens.

WS Crawford

Add new sentence after second sentence: Where infrastructure solutions can be provided, longer term growth corridors can provide for additional strategic growth options in the 2018-30 period.

Edinburgh Association of Community Councils (725)

Modify paragraph 3.4, in the last sentence replace 'may' with 'shall'.

Gullane Area Community Council

No modification is specified, the representation indicates that due to the lack of infrastructure and sites for commercial development the viability of the long term growth corridor to North Berwick should be reassessed.

H and H Group Plc

Undertake a detailed review to assess exactly how growth will take place.

Hargreaves UK Services Ltd (465)

Amend Proposed Plan to ensure there is not an over-reliance on Edinburgh's housing delivery to meet the region's requirement. Clearly identify the potential of the strategic growth areas and long term growth corridors to meet the housing requirement.

Homes for Scotland

Modify spatial strategy to reassess Strategic Growth Areas to look at their infrastructure capacity and ability to accommodate additional future growth.

Juniper Green Community Council

Would prefer to see Option 2 (Distributed Growth) from the Main Issues Report taken forward to the Proposed Plan.

Lawfield Estate

Allow flexibility to enable areas identified as longer term growth corridors to deliver housing in the period 2018-30.

Musselburgh Conservation Society

No modification specified, representation indicates the spatial strategy should be modified to steer growth and development towards areas most in need of investment and regeneration, to include Fife and West Lothian.

NHS Lothian Public Health and Health Policy

No modification specified, representation indicates that there should be a clear statement about problems with air quality in the SESplan area to emphasise the importance of developing an active travel and carbon-neutral public transport infrastructure.

Prestonpans Community Council

Modify Figure 3.1 to show the area of open land to the east of Musselburgh (Goshen Farm) excluded from the (blue dotted) area for strategic expansion. Reference to the development anticipated around Musselburgh should be clarified in paragraph 3.13 so as to be explicit in excluding areas which, in the emerging East Lothian LDP have not been identified as land for housing or other development (i.e. Goshen farm). Representation indicates that it should be made clear that Local Authorities, whilst guided by the SDP, must have the ability to reflect local circumstances.

Crawford and Douglas Ritchie

Modify Figure 3.1 Key Diagram (page 13) to show Key Areas of Change for South East. Modify spatial strategy to give clearer guidance on scale and location for development for period 2030 – 2038.

Roslin and Bilston Community Council

No modification is specified, the representation indicates that the A701 should not be referred to as a growth corridor and that Edinburgh should be the focus for development as this is where employment is located.

### Rural Renaissance

Clarify that allocations will be made in areas where there has been historic demand.

### Scottish Environment Protection Agency

Either modify the Key Diagram and Edinburgh and West diagram to remove any areas of flood plain and flood risk from areas identified for growth, or alternatively add appropriate proposals for actions which will avoid increased flood risk to or from sites to which development is being directed.

### SP Energy Networks

Revise the spatial strategy in context of a modified vision which includes more specific recognition of infrastructure requirements for the area, and its role in helping to deliver the vision of NPF3. Include a new section (Strategic Infrastructure Requirements) after paragraph 3.6, setting out: (i) strategic infrastructure requirements within the city region; and (ii) the role of the city region in delivery infrastructure of national significance. Include as a minimum: Upgrading, improvement and reinforcement works to the electricity grid will be required throughout the SESplan period. Large scale reinforcement works, including the provision of new overhead line route and new substations, can fall within the scope of national development number 4, as defined by NPF3. Such works, as well as more general upgrading and improvement works, are essential to the delivery of not only the SESplan vision, but the national Vision as defined by NPF3. LDPs will facilitate and safeguard such development in locations and forms as required by the grid operator.

### Wallace Land and Investment

Add to para 3.1 "The only evidence setting out locations suitable to accommodate growth is the approved SDP Spatial Strategy Assessment Technical Note (November 2011) and the subsequent Supplementary Guidance Technical Note (November 2013). Appendix A of the Supplementary Guidance Technical Note provides the most up to date assessment of the appropriate spatial strategy for the SESplan area. Future areas of growth required to meet the Strategic Growth 2018 - 2030 and Long Term Growth Corridors 2030+ should be prioritised in accord with the identified 11 Areas. These Areas together with the remaining Areas already identified in Local Development Plans for longer term growth, are shown in Figure 3.1." Modify Figure 3.1 to reflect the changes sought in the individual areas of Key Areas of Change for South East and Edinburgh and West. Re-evaluate the following areas to establish development potential: 6. M9 Corridor 8. M8 Corridor 11. South West Edinburgh; 12. South Edinburgh; 13. South East Edinburgh 14. Central Edinburgh; 18: A7 / A68 / Borders Rail Corridor 19. A701 Corridor; 21: East Lothian West 22. East Lothian Central; 24: East Lothian East. Modify Figure 3.1 to include all rail corridors as sustainable locations for future growth. Expand paragraph 5.13 to provide further guidance of the scale and location of growth within the each of the respective LDPs (p47, para 5.13).

### **Summary of responses (including reasons) by Planning Authority:**

#### **The Strategy**

Edinburgh Association of Community Councils, Grange and Prestonfield

Community Council, Mr Jon Grounsell, Gullane Area Community Council, Hargreaves UK Services Ltd, Homes for Scotland, Lammermuir Community Council, Liberton and District Community Council, D and L McAuslan, Moorfoot Community Council, Mrs Constance Newbould, Mrs Gail Reid, Crawford and Douglas Ritchie, Roslin and Bilston Community Council, South West Communities Forum, Transform Scotland (137)

The Proposed Plan strategy has been developed from the options consulted upon at Main Issues Report stage. This is based on the preferred option. The evidence for the proposed plan spatial strategy was considered at Main Issues Report stage and Spatial Strategy Technical Note and the Housing Land Technical Note. Chapter 11 of the Proposed Plan Housing Land Update which provides estimates of current housing land supply estimates.

Figure 3.1 on page 13 and related text and maps explain the strategy clearly. This concentrates most new development in and around existing settlements, particularly Edinburgh. Strategic growth is also proposed for the rural growth areas in Scottish Borders, in the settlements of East and West Lothian and in Fife.

This strategy also identifies green belt and areas for improvements to green networks, including where these cross council boundaries. Paragraphs 3.8 and 3.9 on page 14 explain the role of green belts and green networks. Long Term Growth Corridors around Edinburgh and in Fife are then identified for post 2030.

Much of the strategic growth forms long term proposals that are already identified in adopted and proposed LDPs. The identification of individual sites for development will be a matter for the respective LDPs. Paragraph 3.2 also explains that LDPs have already identified much of the land needed to accommodate the housing land requirement up to this time. This may mean that respective LDPs do not need to identify much new land or alternatively choose to deallocate in favour of other sites. These are matters for each council through their LDP preparation process.

The settlement focus does not constitute ribbon development, as some respondents have suggested. Instead it reflects a strategy that concentrates the majority of new development in the settlements with the largest concentrations of people, jobs, services and facilities. As such this strategy promotes the reuse of previously developed land and buildings, reduces the need to travel and protects the countryside. The strategy ensures that homes are built close to employment. This strategy therefore avoids ribbon development.

Infrastructure is essential and new development brings with it the opportunity of improved infrastructure that may not otherwise be delivered. The concentration of strategic growth in existing settlements, particularly in and around Edinburgh, is designed to provide more travel options and support the development of new / improved infrastructure and services to support non-car travel, particularly active travel. Active travel objectives are also supported by the green network approach.

SESplan considers that this strategy strikes the best balance to overcome the many often competing and sometimes conflicting challenges in a way demanded by the vision and Scottish Planning Policy (SPP) paragraphs 26 to 29 and 40 (Ref).

No alternative proposals have been provided with justification to explain how these would offer a more sustainable and deliverable approach to respond to the multiple challenges facing this city-region in the future. **No modifications proposed.**

Mrs Gail Reid

The Borders Rail clusters recognise the opportunities that result from this new transport connection for the numerous centres located along its route. **No modifications proposed.**

Midlothian Green Party

Edinburgh is a major attractor of workers and visitors, as well as being a major residential location. It is also important to recognise that Edinburgh is not and will not be the only location where there are concentrations of work and services. The strategy also recognises the importance of other settlements.

This places the greatest share of the population within reach of jobs, services and facilities that are accessible by a range of transport modes, particularly active and passenger transport modes. It is unclear what alternative strategy would better serve this objective since it is not possible to control the choices people make about where to live and work. Commuting as a concept is inevitable but the strategy is about enabling modal choice away from car travel and a greater proportion of housing will be located within Edinburgh than required by the current SDP. The chosen strategy had the best outcome compared to the alternatives assessed in the Environmental Report.

The long term growth corridors are not just based on rail lines; although these are important. Instead they focus on existing concentrations of development. This is crucial because it reinforces the central purpose of the strategy, which is not about commuting, but about reducing the need to travel, improving access and supporting modal shift for all types of journey. Concentrating growth around hubs on the Borders Rail network is one example of how this could take place, but it does not constitute the only method by which the strategy is delivered.

SESplan remains persuaded that the current strategy represents the best option to respond to the respondent's concerns. **No modifications proposed.**

Prestonpans Community Council, Wemyss & March Estate / Socially Conscious Capital

The SDP sets the context for LDPs. It will be for each of the LDPs to identify appropriate land for all types of land use in accordance with the strategy. The appropriate public engagement will take place at that stage, including seeking views on proposed development sites. **No modifications proposed.**

Homes for Scotland, Crawford and Douglas Ritchie

Figure 3.1 provides clarity on the focus of strategic growth within the largest settlements and Figures 5.1 and 5.2 provide clarity on the scale of new homes planned for. The flexibility therefore sought by Homes for Scotland is apparent both in the fact that LDPs will determine which sites to allocate and that the proposed plan does not specify which these are. However, flexibility to deliver

development in locations which would conflict with the vision and strategy should not be supported. SESplan is not persuaded that it is either necessary or appropriate to make the changes sought. **No modifications proposed.**

#### WS Crawford

Figure 3.1 and the subsequent maps are clear about where the strategic growth up to 2030 will be focused. Even if respondents consider there to be strong potential in the long term growth corridor the strategy is clear that development will first focus on existing settlements. **No modifications proposed.**

#### Trinity Community Council

Support welcome. Residential, commercial and green network land uses are compatible. The relative success of green networks is that they include a variety of green and blue spaces that are linked into a network across other forms of development. This can be mutually beneficial. **No modifications proposed.**

#### Wallace Land and Investment

The statutory review period for SDPs requires submission of a proposed plan within 4 years of the current plan's approval date. This presents several opportunities in the run up to 2030 to monitor progress and establish the principles necessary to clarify how Long Term Growth Corridors will be delivered. This will include which, if any of these corridors carries comparatively higher or lower priority. No evidence has been presented by the respondent to persuade SESplan that this could or should be done now in this plan.

The evidence for the proposed plan spatial strategy was considered at Main Issues Report stage and within the Spatial Strategy Technical Note and Housing Land Technical Note. The strategy concentrates most new development in and around existing settlements, particularly Edinburgh. Much of the strategic growth forms long term proposals that are already identified in adopted and proposed Local Development Plans. SESplan considers that this strategy strikes the best balance to overcome the many often competing and sometimes conflicting challenges in a way demanded by the vision and SPP paragraphs 26 to 29 and 40 (Ref).

The long term growth corridors are not about promoting a commuting-based strategy. Instead they focus on existing concentrations of development. This is crucial because it reinforces the central purpose of the strategy, which is not about commuting, but about reducing the need to travel, improving access and supporting modal shift for all types of journey. **No modifications proposed.**

#### Aithrie Estates

Figure 3.3 is designed to explain the locations where growth will be concentrated. It also sets out the locations of some of the significant business clusters that are described in Table 4.1. Tables 5.1 and 5.2 explain the scale of housing growth. There is a presentational balance between the amount of material on a map and how understandable that map is to the reader. SESplan judges the proposed plan to have the right balance and that the inclusion of more material would make it less understandable. SESplan remains satisfied that the maps contain the appropriate information and that sufficient detail can be found in other parts of the Proposed Plan.

It is also important to recognise that LDPs will identify and allocate specific development sites. Paragraphs 5.8 to 5.10 of the Proposed Plan set out the approach in compliance with SPP paragraph 118. Based on current housing land estimates only City Of Edinburgh may be required to allocate additional housing land but for all SESplan member authorities this will be dependent on land supply estimates during LDP preparation. It would not be helpful for the proposed plan to set out sites prior to detailed work had been carried out and the requisite public engagement had taken place at LDP stage. **No modifications proposed.**

#### Barratt and David Wilson Homes

Strategic Growth areas are clearly identified in Figure 3.1 and subsequent maps. The long term growth corridors (post 2030) include and / or link many of these strategic growth areas between Edinburgh and its surroundings and in Fife. It is important to include the strategic growth areas because these illustrate the focus of the strategy within and around the largest settlements. **No modifications proposed.**

#### **Regeneration**

##### Musselburgh Conservation Society

The strategy focuses on existing settlements, particularly in and around Edinburgh. This presents the opportunity to provide for homes and jobs that are close together. It also presents opportunities to overcome problems associated with high demand as well as opportunities to regenerate and transform other areas. Successful regeneration will transform areas of currently low demand into areas where people actively seek to live. This outcome would also have the potential to relieve some of the pressure on currently high demand areas. However, the strategy cannot be delivered solely with regeneration of previously developed land and buildings, particularly in areas with low concentrations of this.

SESplan is satisfied that the proposed strategy is best placed to do this and does not consider that a strategy focussing solely on regeneration would deliver on all of the challenges faced. SESplan is also satisfied that the proposed strategy strikes the right balance between the need for regeneration and the continued development of existing settlements. **No modifications proposed.**

#### Rural Renaissance

There is one single housing market area covering the whole of the SESplan area. Tables 5.1 and 5.2 set out the housing supply targets and land requirements for the SESplan area and for the component council areas to provide clarity for LDPs.

It is likely that areas of historic demand will continue to be areas where land is allocated for development. However, SESplan does not agree that historic demand should be the basis for site allocations. Were this to be the case it would make transformation and regeneration impossible. The basis for meeting demand is the strategy as illustrated by Figure 3.1 and subsequent maps. **No modifications proposed.**

Housing matters are considered in more detail in the Schedule 4 summaries of unresolved issues for Issues 8, 9 and 10.

### **Alternative Strategy including Dispersal**

#### A. J. C. Clark, Juniper Green Community Council

A strategy of dispersal would result in increased travel demand because the largest settlements continue to represent the locations where most jobs, services and facilities are already located. This would therefore promote an increase in carbon emissions, bring adverse consequences for air quality and require access to a car. It could also present challenges to passenger transport viability servicing a low density, dispersed population. Such an outcome would result in a pattern of development which is unsustainable and risks adverse environmental impacts. This view is shared in SPP paragraphs 40, 75, 79 and 270.

SESplan agrees that higher density can contribute to a reduction in the need for development land. However, it is unclear how this complements dispersal. Successful settlements must be places where people want to live. Although higher densities can make a contribution to this it is also clear that many consumers seek individual homes with gardens. This strategy aims to support both of these lifestyles within close proximity of services and facilities. SESplan does not agree that the proposed strategy requires a radical rethink and remains persuaded that it is appropriate. **No modifications proposed.**

#### Cockburn Association

Improvements to engine technology could result in a reduction in localised air pollution and carbon emissions. The net impact will depend on the power source for vehicles and fuel source production / generation method. Although carbon emissions and air quality issues have informed the strategy so too has access to jobs and services and the health benefits of active travel. Apart from the broader benefit of better air quality on human health it is less clear how engine improvements and potentially longer travel distances would improve active lifestyles and access to jobs / facilities or diminish the potential impact of development on green space. Therefore whilst such technological improvements are to be welcomed they will support the delivery of the proposed strategy as opposed to justifying an alternative, more dispersed approach. **No modifications proposed.**

#### Cramond & Barnton Community Council, Friends of the River Almond Walkway

The digital economy is important for the future of both our economy and society. It brings various opportunities and challenges which have very different implications:

- a. Workers who live in one place and work almost permanently from home but are employed by an organisation based elsewhere. These workers have the opportunity to live almost anywhere provided the digital infrastructure can support this. Quality of life and affordability of property are likely to be major determinants of housing choice.
- b. Workers who work from home because home is their work place. This includes some family run businesses such as guest houses, hotels, farms and other businesses. Digital technology may transform their work environment but has not been the driving factor in any choice to work from home. This has been driven by the business itself.
- c. Workers who have the option of working from home occasionally or frequently as part of a flexible work environment. This changes the way in which a home

is used but does not sever the importance of the proximity between work place and home.

- d. Workers whose occupation does not allow them to work flexibly or away from the work place. These workers e.g. teachers, medical professionals, trades people and others must go to a place where they carry out their business. The opportunities for digital working may be significant within the work place or at home but the occupation does not allow the flexibility to turn their home into their work place.

Therefore digital change does not offer the same flexibility to all workers. Similarly it offers major opportunities to work from home for some and for in-workplace business operations. There is no evidence to suggest that the proposed strategy prevents the further growth of the digital economy and remote working since these can take place now.

SESplan does not agree that the proposed strategy is 'Edinburgh centric'. However it is accepted that Edinburgh does and must play a central role in the strategy. It is the largest settlement (and Scotland's second largest) with the largest concentrations of people, jobs, services and facilities. The strategy also focuses on other settlements, including those in defined rural growth areas. No evidence has been presented to justify amendments to this strategy or the adoption of an alternative. **No modifications proposed.**

### **Infrastructure**

Builyeon Farm LLP, Corstorphine Community Council, Gullane Area Community Council, H and H Group Plc, Mrs Mirabelle Maslin, NHS Lothian Public Health and Health Policy, Shepherd Offshore (Scotland) Ltd

Modal shift and improvements in transport services and infrastructure are crucial to the success of the strategy. Strategic transport improvements are identified in Table 6.1 on pages 60 and 61. These are also contained in the Action Programme and the SEStran Regional Transport Strategy (Ref). New development also offers some opportunities to deliver new infrastructure that makes a contribution to improving social, economic and environmental sustainability. This includes the green infrastructure as part of green networks described in Figure 3.1 (and subsequent maps).

The approach to green networks and the placemaking principles (Table 3.1 pages 16 and 17) make clear that infrastructure is an integral part of delivering high quality development as part of the strategy. These principles and the green network approach promote active travel, supported by the proximity of development to existing settlements and centres of activity. This has the potential to make a major contribution to improving air quality as well as reducing carbon emissions. The approach to non-car travel is set out on Proposed Plan page 55 and forms an integral part of the strategy.

Development also brings the opportunity to improve place quality and provide new / improved infrastructure. Paragraph 3.2 makes clear that the 'majority' but not all of the allocations for development (including the housing land requirement from table 5.2 on page 44) has been identified in LDPs. **No modifications proposed.**

### SP Energy Networks

SESplan agrees that infrastructure can be strategic in nature without being cross-boundary. However, a key role of an SDP is to consider strategic, cross-boundary issues. **No modifications proposed.**

### **Green Belts and Green Networks**

#### Scottish Natural Heritage

The strategy is already clear on the role of green belts – part of which is to protect the landscape setting of Edinburgh. SPP paragraphs 49 to 52 are already clear on the details of designation and management of green belts. In particular paragraph 52 explains that LDPs will define the specific boundaries. SESplan does not propose to repeat SPP.

Broader matters relating to green networks and settlement patterns are sufficiently dealt with by the strategy (Figure 3.1 page 13) and place making principles (Table 3.1 on pages 16 and 17). In these instances SPP provides clarity on procedural or policy priorities; the Proposed Plan has defined the strategy for development interpreting these matters for the SESplan area; and, it will be LDP which detail specific sites and boundaries. **No modifications proposed.**

#### Shawfair LLP

Support welcome. Paragraph 3.4 is expressing a position that may be investigated for future SDPs. **No modifications proposed.**

### **Flood Risk**

#### Scottish Environment Protection Agency

The Proposed Plan has been informed by the Strategic Flood Risk Assessment (SFRA), October 2016. An Addendum to the SFRA has also been prepared (Ref) which further identifies potential flooding issues within each of the Key Areas of Change identified in the Proposed Plan and refers to actions contained in the Local Flood Risk Management Plan for the Forth Estuary, June 2016.

The strategy in Figure 3.1 Key Diagram, page 13 is not Ordnance Survey based and as such, represents an indicative, diagrammatic picture of future development. It does not allocate specific sites or determine their exact boundaries and does not mean that all of the land within any of the indicative areas should or will be developed; these are detailed matters for LDPs. The Strategic Growth Areas broadly represent areas already identified for strategic development in adopted and Proposed LDPs. These areas will deliver the vast majority of the growth requirements of the Proposed Plan as explained in paragraphs 3.2, 5.8 and 5.9. The Proposed Plan's Placemaking Principles (Page 12 paragraphs 3.5-3.6 and Table 3.1 pages 16 and 17) also make clear that new development should be located away from flood plains and, subject to suggested changes, confirms that any proposed development sites within areas of strategic growth will be subject to assessment of a range of considerations, including environmental constraints such as flood risk, in LDPs and at more detailed planning stages (See Issue 3).

The Proposed Plan has been informed by SPP paragraphs 79, 88, 169, 222 and 254 to 268 (Ref) which sets out a clear approach to managing flood risk. SESplan does not propose to repeat these. SESplan is satisfied that the Proposed Plan and

SFRA provide appropriate clarity and direction to LDPs in order to minimise flood risk. **No modifications proposed.**

### **Specific Sites and Areas**

#### CALA Management Ltd

The area to the south of the A70 is green belt and to its north is the Edinburgh and West Green Network Priority Area with a significant business cluster around the Herriot Watt campus (Figure 3.3). SESplan is satisfied that this is appropriate within the context of the strategy and no modifications are proposed.

SESplan does not agree that it is misleading to say that '*the need for strategic growth will be largely met by land already identified in existing and proposed Local Development Plans*'. This statement is compliant with SPP paragraph 118 and is further explained in paragraphs 5.8 and 5.9. The statement rightly points out to communities and businesses that much of the land for strategic growth has already been identified in LDPs. It will be for individual councils to determine whether to amend sites, re-allocate, de-allocate or allocate new sites, informed by land supply estimates during production of LDPs.

Tables 5.1 and 5.2 set out the housing supply targets and land requirements respectively for the whole SESplan area and the constituent council areas. The SESplan area forms a single housing market area. Therefore these tables reflect SPP paragraph 118 because they stipulate these requirements for the SDP area, the functional housing market areas and each local authority area.

The strategy also indicates the broad locations where land should be allocated in Figure 3.1 and subsequent related maps up to year 12 and beyond to year 20. These also fulfil the requirement of SPP paragraph 118 to explain the scale and location of housing land, including by LDP area. **No modifications proposed.**

#### Ashfield Land, Hallam Land Management Ltd, Lawfield Estate, Park Lane (Scotland) Ltd, Taylor Wimpey / Hallam Land

Support welcomed. Individual proposals for sites and localities are matters for the respective LDP. SESplan remains satisfied that this strategy balances a variety of competing and conflicting challenges in favour of the vision and a sustainable pattern of development. **No modifications proposed.**

### **Other**

#### Cockburn Association

The spread of growth across Scotland is a matter for National Planning Framework (NPF). NPF3 (Ref) makes clear that South East Scotland, as home to Scotland's second largest city, is a major location for growth. Similarly the robust and credible housing need and demand assessment (Ref), along with other work concludes that substantial growth is projected for this part of Scotland. SESplan's role is to plan for the future of this area. SESplan does not have the role, remit or responsibility to plan for other areas of Scotland.

The proposed plan has been prepared with an accompanying Strategic Environmental Assessment (Ref) and Habitats Regulations Appraisal (Ref). Both of these exercises have been available for public comment and have had a strong

role in shaping the plan and its strategy. It is unclear what additional environmental risk is being identified that has not already been considered by these assessments and taken into account. Environmental quality plays a substantial role in the strategy as per the green networks (eg Figure 3.1 page 13) and also the place making principles (Table 3.1 pages 16 and 17). SPP also sets out numerous policy and procedural requirements for considering social and environmental factors in preparing plans and taking development management decisions. SESplan does not propose to repeat these.

SESplan is satisfied that the appropriate considerations of environmental impact have been taken into account and form an integral part of the strategy. **No modifications proposed.**

SESplan notes sixteen representations of support for this section of the Proposed Plan as well as representations of support for strategic growth 2018 – 2030 at Bathgate, that the principles appropriately set the direction of travel for the development of the key infrastructure required for South East Scotland to become a city region, the acceptance that Edinburgh will meet a larger portion of the region's housing needs is very welcome and that the strategy will maximise the benefits associated with established transport links

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]

<b>Issue 2.2</b>	<b>The Green Belt and Related Designations</b>	
<b>Development Plan reference:</b>	<b>The Green Belt and Related Designations (pages 12 – 14, paragraphs 3.1 – 3.9)</b>	<b>Reporter:</b> [Note: For DPEA use only.]
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Avant Homes (Scotland) Ltd (032238)  CALA Management Ltd (929806)  Cockburn Association (037249)  Corstorphine Community Council (040316)  Cramond and Barnton Community Council (803443)  Damhead and District Community Council (039328)  Edinburgh Association of Community Councils (040476)  Esk Valley Trust (037349)  Eskbank and Newbattle Community Council (891202)  Friends of the River Almond Walkway (925870)  Gladman Scotland (783418)  Grange and Prestonfield Community Council (790304)  Mr Jon Grounsell (786916)  Gullane Area Community Council (037068)  H and H Group Plc (927998)</p>	<p>Juniper Green Community Council (028859)  Liberton and District Community Council (790396)  Mactaggart and Mickel Homes (038949)  Mr Mike Martin (798523)  Mrs Mirabelle Maslin (928549)  D and L McAuslan (040611)  Midlothian Green Party (778339)  NHS Lothian Public Health and Health Policy (840024)  Prestonpans Community Council (039835)  Rosewell and District Community Council (790523)  Roslin and Bilston Community Council (790524)  Scottish National Parks Strategy Project (930044)  Scottish Natural Heritage (790587)  Scottish Wildlife Trust (038549)  Sport Scotland (029346)  Mr Charles Strang (907037)</p>	
<b>Provision of the Development Plan to which the issue relates:</b>	The Spatial Strategy – Green Belts and countryside.	
<b>Planning Authority’s summary of the representation(s):</b>		
<p><u>Avant Homes (Scotland) Ltd</u>  Consider that the approach in the Midlothian Proposed Local Development Plan (LDP) conflicts with the Proposed Plan as it identifies land as green belt which is not identified in Figure 3.2. Need to provide more explicit guidance to LDPs to ensure that the location of green belts is properly interpreted. Support approach to strategic growth and recognition of the growth potential of Eskbank.</p> <p><u>CALA Management Ltd</u>  Prevention of coalescence is not a function of green belt as set out in Scottish Planning Policy (SPP) paragraph 49 and should be deleted.</p>		

#### Cockburn Association

Growth on the scale envisaged for Edinburgh, will severely damage its green belt. Allowing development in the green belt creates windfall gains in land values which will accrue to landowners and developers, and amenity benefits to house purchasers, at the expense of losses in amenity to the wider community and in public value. Green belt development also fails to increase the supply of affordable housing where the main pressures and shortages occur. The degree of protection for the green belt residue is not specified. The green belt should be maintained to enhance the amenity and landscape of the area around the city, to sustain the natural environment, and to preserve the natural boundaries and context of the city and prevent coalescence with neighbouring communities. A robust mechanism must be implemented to protect green belt 'residues' in perpetuity.

#### Corstorphine Community Council

There is a conflict between paragraph 3.8 and paragraph 5.17 on maintaining the green belt and enhanced green networks and paragraph 3.4 which directs LDPs to release land including from the green belt. Long term growth corridors in West Edinburgh are also covered by the Edinburgh and West Strategic Green Network Priority Area. Development that incorporates green belt or other parts of the green network will fracture such green networks, leading to isolated green pockets / wedges.

#### Cramond and Barnton Community Council

Support proposals for a strong and extensive green belt around Edinburgh. The challenge will be to adequately protect the values of the green belt to prevent further erosion.

#### Cramond and Barnton Community Council, Friends of the River Almond Walkway

Concerned that the City of Edinburgh Council will fail to protect the green belt under pressure from developers, as has been the case in North and West Edinburgh throughout period of Strategic Development Plan (SDP) 1.

#### Damhead and District Community Council

The A701 relief road is contrary to this policy position.

#### Edinburgh Association of Community Councils, Grange and Prestonfield Community Council

There should be no direction to release land from the green belt (paragraph 3.4) without at the same time providing land of green belt / open space / green network designation of equal or better quality to that lost.

#### Esk Valley Trust

Welcome the retention of the green belt as a major positive element in the landscape and in protecting the amenity of places to live and places to work. Green belt release must be resisted.

#### Eskbank and Newbattle Community Council

There is no indication as to why LDPs are directed to release land in the green belt in paragraph 3.4. The principle that green belts will be secured to maintain identity, character and landscape, etc in paragraph 3.8 is very positive.

Gladman Scotland

Concerned that paragraph 3.1 on green belts does not emphasise clearly enough that green belts, whilst being important tools for the control of development, are not sacrosanct and should be monitored and managed in the same way as any other planning land-use designation or policy tool as set out in SPP.

Mr Jon Grounsell

Disagree with emphasis on green networks and growth corridors building through the green belt.

Gullane Area Community Council

It is essential that the countryside around towns policy, conservation area designations and enhanced green infrastructure and networks are enforced.

H and H Group Plc

Do not consider a full and proper review of the current green belt has been addressed.

Juniper Green Community Council

The growth corridor strategy would lead to ribbon development and severely damage the Edinburgh green belt. The protection of the green belt continues to be eroded. The Edinburgh green belt should be maintained to enhance the amenity and landscape of the area around the City to sustain the natural environment and prevent coalescence of neighbouring communities. A mechanism to protect the green belt in perpetuity should be implemented.

Liberton and District Community Council

A debate on the future role of the green belt (both areas for development and areas to be protected long term) should take place as soon as possible to obtain consensus with those on the urban fringe. This should not be facilitated via the Green Network Priority Areas as indicated in the Enhanced Green Network section of the Plan. Until this is resolved the existing green belt outside Strategic Development Areas should be protected from development.

Mactaggart and Mickel Homes

Designations being introduced at LDP level - e.g. countryside around towns in East Lothian should be given careful consideration, with a view to not prejudicing potential future development or plan allocations in the period 2030+.

Mr Mike Martin

Support the maintenance of the green belt, as it prevents coalescence, loss of community identity, congestion, and landscape / amenity values. We note and approve the continued inclusion of Balerno in the green belt and will seek to resist developer plans to build in it.

Mrs Mirabelle Maslin

Why release land from the green belt (paragraph 3.4) when two-thirds of respondents to a MORI IPSOS poll of 2015 said that they did not want more of the green belt to be destroyed? Paragraph 3.8 - Due to the strategy of SDP1,

coalescence is already taking place. Erosion of community identity is known to result in an increase in the incidence of mental health problems. There are new developments where there is little or no access to open space. How can it be ensured that this trend is halted and that green space is provided where currently there is none?

#### D and L McAuslan

The green belt should be offered protection in order to fulfil the plans vision of maintaining and improving green belts and the green network.

#### Midlothian Green Party

Paragraph 3.8 includes an overly narrow view of the potential of green belts.

#### NHS Lothian Public Health and Health Policy

The decision to release some parts of the green belt for housing development is understood but it is important that this is not viewed as a model for future plans. One plan does not set the precedent for the next.

#### Prestonpans Community Council

The Plan allows for green belt release on the basis that wedges of green belt survive. This is an open invitation to developers and will allow for coalescence between communities and loss of their landscape settings.

#### Rosewell and District Community Council

Do not agree with releasing land from the green belt. Provision must be made for safeguarding.

#### Roslin and Bilston Community Council

Two-thirds of respondents to a MORI poll of 2015 expressly said they did not want the green belt to be destroyed.

#### Scottish National Parks Project

The Plan should propose the establishment of a new national park centred on the northern flanks of the Cheviots.

#### Scottish Natural Heritage

While green networks have a role in protecting and enhancing natural heritage assets, this differs from the purpose of green belt policy. We recommend that policy in paragraph 3.4 is updated so that it more clearly sets out that the green belt and any future green networks will have distinct planning purposes, albeit with some degree of complementarity.

Support for paragraph 3.8 (page 14) which directs LDPs to identify and maintain green belts, but seek clarity on the final sentence: 'In doing so, Local Development Plans will take into account any relevant guidance on green networks'.

#### Scottish Wildlife Trust

The contribution to the overall green network should be made a material consideration of development. Assessing the green quality of a development has been highlighted as an issue by local authorities and by developers. Scottish

Wildlife Trust has been developing the Natural Capital Planning Standard which aims to give each development an overall rating in terms of the ecosystem services it is delivering.

Sport Scotland

Support the approach set out in paragraph 3.8. Some forms of sports development require an outdoor countryside location and policies which do not seek to preclude all forms of development in the green belt nor impose a blanket ban are supported.

Mr Charles Strang

LDPs should ensure the preparation of detailed Management Plans for green belts, and the suggestion that green wedges can replace green belts, if that is the interpretation to be placed on the second half of paragraph 3.4, should be resisted.

**Modifications sought by those submitting representations:**

Avant Homes (Scotland) Ltd

Amend paragraph 3.8 to: "Figure 3.1 Identifies the broad location of the existing green belts around Edinburgh and to the west of Dunfermline. Local Development Plans will identify and maintain green belts in the broad locations shown on Figure 3.1 and other countryside designations fulfilling a similar function where they are needed: To maintain the identity, character and landscape setting of settlements and prevent coalescence, To protect and provide access to open space, To direct development to the most appropriate locations and support regeneration. In doing so, Local Development Plans will take into account the broad location of the green belts set out in Figures 3.1, 3.2, 3.3, 3.4 and 3.5, and any relevant guidance on green networks."

CALA Management Ltd

Delete bullet point 2 under paragraph 3.8.

Corstorphine Community Council

Paragraph 3.4 should be modified to stress the importance of the green belt and green network and that any release is a last resort. Development in such areas would be expected to include exceptional green infrastructure with cycle and walking routes. The direction in paragraph 3.4 should be reflected in paragraph 5.17 onwards (Enhanced Green Networks).

Cramond and Barnton Community Council

No modification is specified, representation indicates that the focus of the strategy on Edinburgh should be reduced and that opportunities for new villages and towns with good digital communications around the region should be investigated. This would thereby reduce commuting to / within Edinburgh and retain / improve the quality of life of Edinburgh's citizens.

Edinburgh Association of Community Councils

No modification specified, representations indicates that reference to the provision of green belt / open space / green network to compensate for any green belt release should be added to paragraph 3.4. Modify paragraph 3.8 to stress the importance of keeping land near urban centres for food production.

#### H and H Group Plc

A detailed review to assess exactly how other growth will take place should be undertaken. Require member authorities to undertake detailed review of the green belt. Remove Heriot Watt campus from green belt notation in key diagram and Edinburgh and West.

#### Mactaggart and Mickel Homes

Modify key diagram to extend long term growth corridor 2030+ from Haddington towards East Linton and onwards towards Dunbar.

#### Midlothian Green Party

No modification specified, representation indicates that paragraph 3.8 should include positive policy support for the sustainable agricultural use of the green belt especially for local food production.

#### Scottish Natural Heritage

Modify paragraph 3.4 to make a clearer distinction between 'green belt' and 'green networks', both in planning policy and general definition terms of each.

#### Scottish National Parks Project

Modify spatial strategy to add a new national park allocation on the northern flanks of the Cheviots.

#### Scottish Wildlife Trust

Add to the bullet point list under paragraph 3.8, To act as a buffer to designated sites, such as SSSIs, or locally important wildlife sites.

#### Sport Scotland

No modification specified, representation indicates that further clarity should be added to paragraph 3.8 that sport and recreation development which has a site specific locational need, would be an appropriate form of development to be permissible in the green belt in accordance with SPP.

### **Summary of responses (including reasons) by Planning Authority:**

#### **Perceived Risks to Green Belts**

Cockburn Association, Cramond and Barnton Community Council, Esk Valley Trust, Friends of the River Almond Walkway, Mr Jon Grounsell, Gullane Area Community Council, Mr Mike Martin, Mrs Mirabelle Maslin, Prestonpans Community Council, Roslin and Bilston Community Council, Scottish Wildlife Trust  
SESplan recognises that there are and will continue to be development pressures on green belt land in some locations. The Proposed Plan continues to identify two green belts, one around Edinburgh and another at Dunfermline.

The proposed strategy is designed to concentrate strategic growth within or close to existing settlements. This is intended to improve access to jobs, services, and facilities (including open space), reduce the need to travel by car and protect the countryside. The green belts and green network priority areas are important components of the spatial strategy. They are one way of contributing to objectives

of protecting countryside around towns from development. The green network approach is also integral to improving place quality and supporting active lifestyles. This strategy is clearly set out in Figure 3.1 on page 13 (Ref) and related maps on subsequent pages.

Given the variety of competing and often conflicting challenges SESplan is satisfied that the proposed strategy is best placed to meet all of these collective challenges.

The detailed identification of sites and boundaries for green belt and development site allocations will be critical and this will be a matter for the respective LDPs. SESplan is satisfied that this strategy is clear and appropriate and therefore no modifications are proposed.

Paragraphs 51 and 52 of SPP (Ref) are already clear about development that is acceptable within a green belt and the circumstances in which LDPs should identify these types of development. SESplan does not propose to repeat SPP (Ref).

SPP (Ref) is also clear about the protection of important historic and natural assets. These historic and natural assets and sensitive locations are already a material consideration in planning decisions. SPP (Ref) is already clear on the approach and procedures for these matters and SESplan does not propose to repeat these. These principles are also reflected in Table 3.1 Placemaking Principles on pages 16 and 17 of the Proposed Plan (Ref).

For clarity it is not inevitable that there will be green belt release around Edinburgh in the next round of LDPs. This will depend on the work carried out in preparing those LDPs, including the identification of brownfield land and other sites that are not within the green belt.

**No modification proposed.**

### **Designation and Management of Green Belts**

Avant Homes (Scotland) Ltd, Gladman Scotland, Juniper Green Community Council, Liberton and District Community Council, Rosewell and District Community Council, Sport Scotland

The SESplan proposed strategy is clear that strategic growth will be focused in the largest settlements, and particularly in and around Edinburgh. Green belts and green networks form an integral part of this strategy as set out in Figure 3.1 on page 13 and related maps and text.

Green belts are designed to perform several functions that are described in paragraphs 49 to 52 of SPP (Ref). Green belts do not represent a blanket ban on development but instead a policy approach to limit the types of development that can take place. SPP (Ref) makes clear that green belts are part of a settlement strategy and that they should be reviewed, this means that they do not remain in perpetuity, although it is plausible that many green belt areas will remain part of the green belt.

SPP (Ref) makes clear that the exact boundaries of a green belt will be defined by LDPs. LDPs will also identify types of development that are appropriate within green belt areas. Paragraph 52 of SPP (Ref) lists examples of these; including

recreational uses which could include some sports facilities. SESplan is satisfied that the Proposed Plan provides an appropriate level of detail to enable councils to prepare their LDPs.

SESplan does not intend to repeat SPP (Ref).

**No modification proposed.**

Avant Homes (Scotland) Ltd

Regarding matters of conformity it is for the engagement and examination process to ensure that an LDP conforms to the respective approved SDP. **No modification proposed.**

CALA Management Ltd

SESplan agrees that paragraph 49 of SPP (Ref) does not mention the word 'coalescence'. However, bullets 1 and 2 of this paragraph clearly mean that the prevention of coalescence is one outcome. SESplan sees no problems in using the word 'coalescence' since the preservation of settlement identity and issues of landscape setting have formed integral parts of the thinking about 'the most appropriate locations' for development and supporting regeneration. **No modification proposed.**

Edinburgh Association of Community Councils, Grange and Prestonfield Community Council

There are significant operational challenges in implementing the idea of designating compensatory green belt land if some is lost to development. These include:

- The green belt boundaries are designated in LDPs and therefore compensatory designation of new land would trigger an LDP review. This would be disproportionately expensive and time consuming and, crucially, would bring together a decision on a planning application with plan review processes. This is not practical since some may use the LDP review to challenge the basis for a planning decision.
- It would be unclear where the new green belt land ought to be and this would present major practicalities of its own.
- Such an approach could effectively invite inappropriate development to green belt locations with the offer of compensatory land elsewhere. It is likely that this would result in a pattern of development that the strategy is designed to avoid.

SESplan is satisfied that the current strategy of concentrating strategic growth within and around the largest settlements, particularly in and around Edinburgh, remains rational. This will continue to be supported by the designation of green belts, whose exact boundary will be determined by the LDPs. Broader green network objectives and the specific identification of allocated sites and their boundaries will also be a matter for individual LDPs. **No modification proposed.**

H and H Group Plc

SESplan has considered that the continuation of the existing green belt remains appropriate. No evidence has been presented to justify a contrary position. Paragraph 52 of SPP (Ref) is clear on the role of LDPs in identifying the exact boundaries of the green belt. SESplan is therefore not persuaded that there is any

evidence to justify an alternative set of conclusions. **No modification proposed.**

#### D and L McAuslan

The green belt is already a designation that limits the range of land uses that can take place in areas it covers. The strategy identifies the green belts, both within and outwith some of the growth corridors. SESplan is satisfied that the proposed strategy makes appropriately clear where green belt land is located; accepting that the exact boundaries will be defined by LDPs. The designation and management of green belt land is already made clear by paragraphs 49 to 52 of SPP (Ref). SESplan does not propose to repeat these. **No modification proposed.**

#### Midlothian Green Party

SESplan does not agree that paragraph 3.8 represents an overly narrow view of the potential of green belts. Their role, function and management are already described in paragraphs 49 to 52 of SPP (Ref) and SESplan does not propose to repeat these. **No modification proposed.**

#### **Proposed Plan Paragraph 3.4**

Eskbank and Newbattle Community Council, Corstorphine Community Council, NHS Lothian Public Health and Health Policy, Mr Charles Strang.

Paragraphs 51 and 52 of SPP (Ref) already make clear that green belts do not represent a complete ban on all forms of development. Therefore some forms of development will be appropriate within green belt areas. SESplan does not propose to repeat SPP.

Paragraph 3.4 describes a possible situation in the future regarding the extent and operation of the green belts. This is a strategic, long term issue. It is appropriate to make this clear now so that thinking can begin early, whilst the current strategy is being implemented. For clarity it is not inevitable that there will be green belt release around Edinburgh in the next round of LDPs. This will depend on the work carried out in preparing those LDPs, including the identification of brownfield land and other sites that are not within the green belt.

**No modification proposed.**

#### **Other Issues**

##### Damhead and District Community Council

SESplan is not persuaded that the A701 relief road (see Table 6.1 on pages 60 to 61) represents a position contrary to policy. Table 6.1 identifies a series of transport infrastructure upgrades required alongside the enhancement of green networks and the delivery of new development. **No modification proposed.**

##### Mactaggart and Mickel Homes

SESplan is satisfied that the broad strategy remains the most rational approach. Countryside around towns and other such designations are a matter for LDPs. **No modification proposed.**

##### Scottish National Parks Project

The designation of national parks is a matter for Scottish Government through the appropriate legislation. Were there to be a new national park on the northern flanks of the Cheviots this area would be independent of SESplan because

Strategic Development Planning Authorities do not cover national parks. **No modification proposed.**

Scottish Natural Heritage

The sentence '*In doing so, Local Development Plans will take into account any relevant guidance on green networks*' recognises that there is multiple guidance on green networks which may change. SESplan considers this to be an appropriate form of words to recognise this. **No modification proposed.**

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]

<b>Issue 2.3</b>	<b>Brownfield Land</b>	
<b>Development Plan reference:</b>	<b>The Spatial Strategy (pages 12 – 14, paragraphs 3.1 – 3.9)</b>	<b>Reporter: [Note: For DPEA use only.]</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>A.J.C. Clark (930956)  Cockburn Association (037249)  Mr Jon Grounsell (786916)  Juniper Green Community Council (028859)  National Trust for Scotland (040626)  NHS Lothian Public Health and Health Policy (840024)  Rosewell and District Community Council (790523)  South West Communities Forum (805601)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Spatial Strategy - Brownfield land	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>A. J. C. Clark</u>  There is no evidence the brownfield first principle is being backed up by strong policies that encourage farming, discourage the sale of farmland of whatever quality, for housing, and positively encourage high density low-infrastructure brownfield development close to where people already work and shop.</p> <p><u>Cockburn Association, NHS Lothian Public Health and Health Policy, Rosewell and District Community Council,</u>  Brownfield land should be used first.</p> <p><u>Mr Jon Grounsell</u>  There are no levers in the planning system to direct new housing onto brownfield land. The requirement to forward supply greenfield housing land removes any incentive to directing growth to more sustainable sites.</p> <p><u>Juniper Green Community Council</u>  Brownfield first is not being observed rigorously. City of Edinburgh planning advice is that Edinburgh could potentially meet 75% of its housing land requirement through brownfield sites. This should be included as an option without the need to identify greenfield sites for development. Also unclear is the amount of brownfield land proposed for use, relative to the total stock of such land.</p> <p><u>National Trust for Scotland</u>  Development should take place on brownfield sites where possible, but the Plan does not quantify the amount of Brownfield land available and how much development it could accommodate.</p>		

South West Communities Forum

Make a clear policy to direct that brownfield land must be substantially used up before using greenfield land.

**Modifications sought by those submitting representations:**

Juniper Green Community Council

No modification specified, representation indicates that all development should be located on brownfield sites.

National Trust for Scotland

The Plan should quantify brownfield land.

**Summary of responses (including reasons) by Planning Authority:**

A.J.C. Clark, Cockburn Association, Mr Jon Grounell, Juniper Green Community Council, National Trust for Scotland, NHS Lothian Public Health and Health Policy, Rosewell and District Community Council, South West Communities Forum

SESplan recognises that the reuse of previously developed land and building (brownfield land) is important in delivering the proposed strategy.

SESplan does not agree that there are '*no levers within the planning system*' to ensure the reuse of previously developed land and buildings. The strategy focuses most new development in and around the largest settlements. This will mean that brownfield land within settlements and strategic growth areas will form an important part of any portfolio of development land, consistent with the principles of paragraphs 48, 80, 101 and 206 of Scottish Planning Policy (Ref).

Table 3.1 Placemaking Principles contains a clear statement that: 'The re-use or re-development of brownfield land should be considered before new development takes place on greenfield land, including Prime Agricultural Land and other land important for food production.'

SESplan is satisfied that the strategy balances the important objectives of improving access to jobs, services and facilities whilst also reducing the need to travel, protecting the countryside and improving living environments. SESplan does not see any advantage in quantifying the amount of brownfield land available since this will change over time. The allocation of individual development sites will be a matter for Local Development Plans (LDP). Not all development can be met on brownfield land in all locations. Given that SPP is already clear on these matters there is no need for SESplan to repeat this in its proposed plan. Instead the strategy explains how it intends to meet the variety of challenges we face in the future. **No modifications proposed.**

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]

<b>Issue 2.4</b>	<b>Prime Agricultural Land</b>	
<b>Development Plan reference:</b>	<b>Spatial Strategy (pages 12 – 14, paragraphs 3.1 – 3.9)</b>	<b>Reporter:</b> [Note: For DPEA use only.]
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Mr George Barton (038878)  Cockburn Association (037249)  Damhead and District Community Council (039328)  Esk Valley Trust (037349)  Grange and Prestonfield Community Council (790304)  Juniper Green Community Council (028859)  Mrs Mirabelle Maslin (928549)  Minto Hills Conservation Group (040607)  North Berwick Community Council (035522)  Roslin and Bilston Community Council (790524)  South West Communities Forum (805601)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	The Spatial Strategy – Prime Agricultural Land	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Mr George Barton</u>  Much greater protection should be given in the Plan to prime agricultural land. Scottish Planning Policy paragraph 80 states that the use of prime agricultural land for development should not be permitted except where it is essential. Much high quality agricultural land is in East Lothian and it should be safeguarded for future generations. Housing should be built on some of the 94.3% of land which is not Prime Quality Land.</p> <p><u>Cockburn Association</u>  Stronger protection should be given to prime agricultural land to ensure that green land should only be used for development that cannot be accommodated on brownfield land.</p> <p><u>Damhead and District Community Council, Mrs Mirabelle Maslin</u>  The Plan must ensure that prime agricultural land is effectively protected.</p> <p><u>Esk Valley Trust</u>  There is no specific policy on safeguarding the best agricultural land.</p> <p><u>Grange and Prestonfield Community Council</u>  Keeping land for food production near urban centres and the importance of food production should be stressed in paragraph 3.8.</p>		

Juniper Green Community Council

Promote farming for food security particularly respecting likely post-Brexit restrictions.

Minto Hills Conservation Group

Paragraph 4.8 should be redrafted to show how crucial the continued good management of prime agricultural land not just to the local or city economy, but to Scotland's.

North Berwick Community Council

Plan does not emphasise food production. Farmland should only be developed as a last resort.

Roslin and Bilston Community Council

Areas allocated for development are prime agricultural land, currently providing food. This is irreplaceable and cannot be replaced by green wedges or green networks.

South West Communities Forum

SESplan should promote food security (for prime and other useful agricultural land) for confirmation in LDPs. Agricultural land should be positively protected and defined in the Glossary as an economic asset for home and export use. Unfortunately, Edinburgh's LDP has dropped any reference to agricultural land. Disturbed to read in the SESplan SEA <sup>(3)</sup> that '*a significant level of the greenfield land required for development around Edinburgh, Midlothian and East Lothian is prime quality agricultural land and that 'the spatial strategy should seek to avoid developing prime quality agricultural land where possible retaining it for local food production.'* If it is policy to develop brownfield first, then development of land of importance for the maintenance of agriculture must be avoided till that brownfield is substantially exhausted.

**Modifications sought by those submitting representations:**

Damhead and District Community Council

No modification specified, representations indicate that greater protection should be given to prime agricultural land.

Esk Valley Trust

No modification specified, representation indicates that the Plan must indicate safeguarding of Agricultural Land Classes 1 to 3.1.

Grange and Prestonfield Community Council

No modification specified, the representation indicates that keeping land for food production near urban centres and the importance of food production should also be stressed in paragraph 3.8.

Juniper Green Community Council

No modification specified, representation indicates that farming for food security should be promoted.

North Berwick Community Council

Propose a hierarchical approach to identifying development sites which recognises agricultural land / food production.

Roslin and Bilston Community Council

No modification is specified, the representation indicates that prime agricultural land should not be developed until all brownfield sites are used.

South West Communities Forum (400)

Promote farming for food security and for export.

**Summary of responses (including reasons) by Planning Authority:**

Mr George Barton, Cockburn Association, Damhead and District Community Council, Esk Valley Trust, Grange and Prestonfield Community Council, Juniper Green Community Council, Mrs Mirabelle Maslin, Minto Hills Conservation Group, North Berwick Community Council, Roslin and Bilston Community Council, South West Communities Forum

SESplan agrees that prime agricultural land plays an important role in food security. Scottish Planning Policy (SPP) paragraphs 79 and 80 (Ref) are already clear about the nature of protection afforded to prime agricultural land and other grades of land. SESplan does not propose to repeat this.

The spatial strategy set out in Figure 3.1, page 13 (Ref) focuses most new development in existing settlements, particularly in and around Edinburgh. This is deliberate because it locates the majority of people close to existing jobs, services, facilities and infrastructure. It is also designed to provide a variety of transport choices and reuse previously developed land and buildings. This approach increases the probability that a large share of new development will be accommodated on brownfield land.

Table 3.1 Placemaking Principles also contains a clear statement which promotes the resource efficient use of land to safeguard Prime Agricultural Land and other land important for food production and that: 'The re-use or re-development of brownfield land should be considered before new development takes place on greenfield land, including Prime Agricultural Land and other land important for food production.'

Therefore the strategy already plans to accommodate the majority of development in locations that are not prime agricultural land. However, there is also a recognition that the scale, nature and distribution of brownfield land means that it will not be possible for all development in all locations to be on brownfield land. Given the importance of locating new development close to services and facilities it may not be possible to avoid development on at least some prime agricultural land. On balance the strategy inherently tries to minimise the loss of prime agricultural land.

Focusing purely on non-prime agricultural land that is outside of the largest settlements presents major challenges to the other objectives of the strategy.

This is because most of the non-prime agricultural land is concentrated to the south and west of the region on higher ground and / or further from the largest concentrations of jobs and services. Such a strategy would result in a pattern of development that requires lengthy commuting and the establishment of new or much enlarged settlements with significant new infrastructure requirements. The Proposed Plan is considered to represent the optimal way of minimising the often competing and sometime conflicting challenges described by paragraph 79 of SPP paragraph 79 (Ref).

Although food security is important SESplan is satisfied that it has appropriately balanced this with other challenges.

It is currently unclear what issues will be faced by the agricultural sector post 'Brexit' and what these might mean in practice for strategic planning. SESplan therefore has no comments on these matters.

Agricultural land as an economic asset for home and export use is not the definition of prime agricultural land set out in SPP.

**No modifications proposed.**

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]

<b>Issue 2.5</b>	<b>Key Areas of Change South East</b>	
<b>Development Plan reference:</b>	<b>Key Areas of Change South East pages 19-21, paragraphs 3.10-3.18 and Figure 3.2</b>	<b>Reporter: [Note: For DPEA use only.]</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Ashfield Land (038483)  Barratt and David Wilson Homes (799597)  Cockburn Association (037249)  Damhead and District Community Council (039328)  Edinburgh Association of Community Councils (040476)  Edinburgh BioQuarter Partners (037370)  Forth Ports Ltd (929573)  Grange and Prestonfield Community Council (790304)  Haddington and District Amenity Society (803807)  Hargreaves Services (038881)  Hargreaves UK Services Ltd (038489)  Highland Residential Developments (034243)  Liberton and District Community Council (790396)  Mactaggart and Mickel Homes (038949)  Mrs Mirabelle Maslin (928549)  Midlothian Green Party (778339)  Midlothian Health and Care Integration Joint Board (040241)  Musselburgh Conservation Society (927996)</p>	<p>Neart na Gaoithe Offshore Wind Ltd (034699)  Mrs Constance Newbould (034296)  North Berwick Community Council (035522)  Queen Margaret University (040312)  Crawford and Douglas Ritchie (040552)  Rosewell and District Community Council (790523)  Savills (793820)  Scottish Wildlife Trust (038549)  Scottish Power Generation (034698)  SEEDCo (038853)  Scottish Environment Protection Agency (790577)  Shawfair LLP (039940)  Shepherd Offshore (Scotland) Ltd (038954)  Mr Julian Siann (024823)  Taylor Wimpey (930050)  Wallace Land Investment and Management (930071)  Mr Andrew Watt (851948)  Wemyss and March Estate/Socially Conscious Capital (037270)</p>	
<b>Provision of the Development Plan to which the issue relates:</b>	Key areas of change within South East area.	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Ashfield Land</u>  Should be ensured that the potential of Musselburgh to accommodate further development is explored fully, taking into account potential infrastructure enhancements / improvements and environmental mitigation measures. Support a positive approach to meeting the housing requirement but consider that a second</p>		

new settlement should not be the preferred approach. Priority should be to realise the full potential of existing settlements.

Barratt and David Wilson Homes

Further strategic growth requirements in East Lothian may require the potential for a new settlement to be investigated. East Linton can provide a location for strategic growth to maximise infrastructure investment in the proposed new rail station.

Cockburn Association

Support paragraph 3.11 of the Proposed Plan. Seek clarification of potential for development of Leith Docks as the scale and nature of this will have significant implication for the scale and nature of development throughout the region and around existing settlements. Question the requirement of Leith Docks for renewables if these are being proposed for Cockenzie and Longannet, Eyemouth and Dunbar. Support development at Blindwells and in East Lothian with the proviso that loss of prime agricultural land is minimised. Concerned about proposals at Queen Margaret University as it would facilitate coalescence contravening placemaking principles. Do not support paragraph 3.10. Question if Blindwells housing numbers have been included in the housing land allocation and consider that if development at Blindwells and any other new settlements in East Lothian were brought forward it would ease pressure on Edinburgh's green infrastructure. Coalescence of existing settlements should be avoided. Support some transport proposals but are not convinced by the case for the Damhead relief road and support approach to green infrastructure.

Damhead and District Community Council, Mrs Constance Newbould

Glencorse Barracks site could be used for housing.

Edinburgh Association of Community Councils

Statements are too weak to ensure the enhancement of green infrastructure. Equal or greater priority should be given to maximising the capacity of the rail network.

Edinburgh BioQuarter Partners

Reference to the Edinburgh BioQuarter and the Edinburgh Science Triangle is lost. The Plan should reflect that the Edinburgh BioQuarter is one of the top ten research and development locations globally. Support the reference to new transport links from Shawfair Station to the Royal Infirmary of Edinburgh. Support the essential role of the tram line extension to Edinburgh BioQuarter, Newcraighall and QMU. Funding for these should be prioritised during the first phase of the Plan (2018-2030).

Forth Ports Ltd

Statements on Leith do not recognise the significance of the Port to the City Region or the extent of its operations. The Proposed Plan does not reflect National Planning Framework National Development 12. Support the text at paragraph 3.11 "the establishment of an attractive cycleway and footpath within the Waterfront" as this does not prescribe a coastal route which would be impossible to deliver.

Grange and Prestonfield Community Council

Generally support statements but should include a reference to reviewing the benefits of re-introducing passenger traffic on the South Suburban rail line and integration with tram / light rail.

Haddington and District Amenity Society

East Lothian should be seen as an asset not a place for commuters. Growth corridors in East Lothian are questioned in the context of lack of employment and transport infrastructure. New settlements should be in strategic locations such as Dunbar. Must be a commitment to transport infrastructure improvements in East Lothian for the plan to be delivered. Rural economy and countryside are important in East Lothian and should be recognised as critical to cultural heritage.

Employment locations in Forth Cluster need to be complimented with housing. If Plan is promoting compact growth, the existing constraints around Musselburgh and beyond into other areas of East Lothian must be resolved. Growth corridor to Haddington requires rail based public transport. Studies should be instigated to assess its potential. Express concern about Haddington, its surrounding villages and countryside and the relationships with the wider area. In placemaking terms the amount of housing proposed cannot be accommodated without damaging existing places.

Hargreaves Services, Hargreaves UK Services Ltd

Support the inclusion of the former Blindwells surface mine as an area of strategic growth and the recognition of the capability of Blindwells to expand beyond the current allocation. There may be a need for second new settlement in the east of East Lothian and it is essential that the full potential of existing settlements and already identified locations such as Blindwells are realised before a further new settlement is brought forward.

Highland Residential Developments

Requests consideration of the potential of Elphinstone to deliver 100 additional homes reducing the requirement for new homes within other settlements in East Lothian.

Liberton and District Community Council

Statements on the BioQuarter are inconsistent with City of Edinburgh Council's actions as the bulk of the site is released for non-science related uses leaving insufficient land for employment creation to merit recognition as a strategic site. If BioQuarter is to have a strategic role then City of Edinburgh Council's supplementary guidance should be set aside.

Mactaggart and Mickel Homes

Extend long term growth corridor 2030+ on Figure 3.1, page 13 from Haddington to East Linton and onwards to Dunbar (Figure 3.1, page 13) Support the need for a second settlement in East Lothian in principle but this should only be considered when a mechanism has been established to address existing constraints.

Mrs Mirabelle Maslin

The development at Blindwells has not taken place because necessary infrastructure was not available and the Proposed Plan should identify deficiencies.

#### Midlothian Green Party

There are serious community concerns around the growth corridor strategy in Midlothian about coalescence, loss of green space, loss of agricultural land and green belt, increasing road congestion and pressure on social, educational and health infrastructure.

#### Midlothian Health and Care Integration Joint Board

Concerned about the impact of new house building on health and care services. Imperative that investment in health and social care infrastructure is included in partnership discussions. Integration Joint Boards should be consulted as part of the Local Development Planning (LDP) process relating to affordable housing. Housing Contribution Statements will be important for helping local housing strategies and LDPs enable the types of homes that will address the needs of a growing, ageing population and the growth in the number of smaller households.

#### Musselburgh Conservation Society

New dwellings should be concentrated in Leith Waterfront, West Edinburgh and unless it has a specific function green belt land up to the city bypass should be developed and this should be acceptable in Gilmerton area.

#### Neart na Gaoithe Offshore Wind Ltd

The Proposed Plan does not take full account of the National Planning Framework, and the national developments as they relate to the South East sub-area.

#### North Berwick Community Council

There are no safe or suitable walking and cycling routes to and in North Berwick. Development will take place on the edge of town away from centres and public transport. The North Berwick area cannot provide the range of non-car transport options which the Plan commits to. Therefore question long term growth. North Berwick will be at capacity for development once the developments specified in the LDP have been completed. Therefore North Berwick should not be identified for future development. Support strategy locating housing near employment, public transport hubs and active travel routes. North Berwick does not match these and cannot support significant further housing development. Express concern that development for East Lothian seems dependant on Blindwells. Question the need for another settlement if obstacles preventing development persist. Countryside around towns designation to be applied around all the edges of North Berwick (west, east and south) identifying a maximum extent of town. Designation should providing similar protection to green belt.

#### Queen Margaret University

Supports the reference to QMU at paragraph 3.15 and considers that the Plan reflects the sectors which are the focus for the new Edinburgh Innovation Park and is a positive outcome from the QMU submission at MIR stage. A modified A1 junction and underpass near Queen Margaret University is required as a priority to enable land adjacent to the university to be developed to support the Innovation and Science Cluster. This land also provides opportunities for start-ups with a focus on life sciences, research and learning and food and drink.

#### Crawford and Douglas Ritchie

It is difficult to identify any new and additional areas where growth is expected in the period up to 2030. Would welcome an indication of additional scale of strategic growth in Haddington to 2030.

#### Rosewell and District Community Council

There is a need for more safe routes for cyclists in Midlothian which avoid heavy traffic.

#### Savills

A new settlement at Fenton Barns sits well with the requirement for a second settlement in East Lothian. Identify land at Fenton Barns as an area for Strategic Growth 2018-30 rather than North Berwick to relieve infrastructure pressure.

#### Scottish Wildlife Trust

Land around settlements in East Lothian is some of the best agricultural land and consideration should be given to the environmental and ecosystem impact of large scale, low density housing there.

#### Scottish Power Generation

Paragraph 3.16 of the Proposed Plan does not adequately represent National Planning Framework policy as it relates to the site of the former Cockenzie Power Station. The site is recognised as having potential opportunities for renewable-energy related investment and the National Planning Framework encourages that development at the site should make best use of the locational assets of the site, as well as bringing significant economic benefit. All of these elements should be reflected in the Proposed Plan.

#### SEEDCo

In Figure 3.2 it is apparent that the size of the Strategic Growth Area has been reduced from the Strategic Development Area identified in the current Strategic Development Plan (SDP) and an area of land, which forms part of The Drum Estate on the edge of the urban area has been omitted and as there is no explanation in the Proposed Plan and there is no background spatial strategy assessment it is unclear whether the omission of the land is an error or deliberate exclusion. Consider omission to be inconsistent with Proposed Plan's aspirations and at the very least the Proposed Plan should be retaining the development areas identified in the current Strategic Development Plan, 2013, if not extending them. Consider the site represents one of the best opportunities for strategic development in South East Edinburgh.

#### Scottish Environment Protection Agency

Object to the Key Diagrams and Figures, as the indicative areas for growth, include areas of flood plain and flood risk.

#### Shawfair LLP

Support inclusion of Shawfair within an area of long term future growth, its importance should be further emphasised. There is an opportunity to make good a known shortfall in housing land supply through ambitious targets and taking cognisance of existing allocated sites which can deliver higher densities and

housing numbers. There is scope to reduce the level of green belt allocations at Shawfair without compromising the green belt function. Role of Shawfair in addressing additional growth should be reflected to allow for further more detailed discussions at local level.

Shepherd Offshore (Scotland) Ltd

Paragraph 3.18 requires to be reworded to reflect the current strategic aspirations in relation to infrastructure and to give direction to subsequent LDPs – “In order to deal with what is one of the region’s major challenges in delivering sustainable growth, a range of transport interventions are likely to be needed.”

Mr Julian Siann

With reference to paragraph 2.5 of the Flood Risk Assessment the development of Edinburgh waterfront would have to include extensive storm surge protection which could make the development unviable.

Taylor Wimpey

Seek clarification of what is meant by the statement at para 3.12 of the Proposed Plan that “Blindwells could benefit from interventions to accelerate its development”.

Wallace Land Investment and Management

It is difficult to identify any new and additional areas of growth in the period up to 2030. There are locations which should be prioritised over Area 23. Support the principle of a second new settlement in East Lothian but consider that it should be properly identified as in East Lothian Central (Area 22) located at Drem and Fenton Barns.

Mr Andrew Watt

The text is unspecific. There are indications of lack of demand in the area therefore there is no requirement at the present time for development on green belt sites.

Wemyss and March Estate/Socially Conscious Capital

Support spatial strategy. Additional housing of a strategic scale at Longniddry South is in accordance with the strategy. Expansion of existing development to be a priority underpinned by placemaking principles. Concerned that the spatial strategy relies on Blindwells to deliver a significant proportion of housing despite failure to demonstrate it as an effective site.

**Modifications sought by those submitting representations:**

Ashfield Land

Change wording of Proposed Plan to make clear that the priority is to meet the housing need through realising the full potential of existing settlements and opportunities within settlements should be explored and delivered in advance of the allocation of an entirely new settlement.

Barratt and David Wilson Homes

Identify East Linton for Strategic Growth 2018-30 in Figure 3.2.

Cockburn Association

At paragraphs 3.11 and 3.16 include an urgent action to monitor the need for renewables at Leith Docks and a review of opportunities for housing at the Docks. At paragraph 3.15 review whether or not the development of green belt in the vicinity of Queen Margaret University contravenes the Distinctive Placemaking Principle. At paragraph 3.12 include a review of whether the implementation of new satellite towns can be brought forward to lessen the housing pressure on Edinburgh. At paragraph 3.18 clearly set out the case for and against the Damhead relief road.

Edinburgh Association of Community Councils

Remove "where possible" from the first sentence of paragraph 3.17. Add to paragraph 3.16 "Early in the plan period the opportunity should be taken to review the benefits of re-introducing passenger traffic on the South Suburban rail line and integrating this with tram / light rail enhanced infrastructure."

Edinburgh Association of Community Councils, Grange and Prestonfield Community Council

Add to paragraph 3.16 "Early in the plan period the opportunity should be taken to review the benefits of re-introducing passenger traffic on the South Suburban rail line and integrating this with tram / light rail enhanced infrastructure."

Edinburgh BioQuarter Partners

Accurately identify the Edinburgh BioQuarter at Figure 3.2. Begin new paragraph prior to reference to BioQuarter at paragraph 3.16, page 19. Reflect ambition that BioQuarter is one of the top ten research and development locations globally, not only in Europe.

Forth Ports Ltd

Amend paragraph 3.16 to read: "Leith is home to Scotland's largest enclosed deep water Port and provides full modern cruise, docking and cargo handling services for a range of vessels and cargoes. It is a strong location for expansion of Freight Handling Capacity on the Forth, large scale manufacturing, installation, operations and maintenance for the renewables industry as well as a centre for the creative industries".

Haddington and District Amenity Society

The Plan should set out an initiative to deliver an economy in East Lothian which counteracts the commuter flow. Plan should protect farming, the rural economy and landscape as key assets and not just as setting to development. Plan should set out an agenda for urgent and immediate infrastructure delivery in East Lothian. Insert statement explaining how existing constraints around Musselburgh and beyond into other areas of East Lothian will be resolved.

Hargreaves UK Services Ltd

Make clear that the full potential of existing settlements and already identified locations such as Blindwells is realised before consideration is given to a further

new settlement.

#### Liberton and District Community Council

Remove reference to BioQuarter at paragraph 3.16.

#### Mactaggart and Mickel Homes

Modify Key Diagram Figure 3.1 to extend long term growth corridor 2030+ from Haddington towards East Linton and onwards towards Dunbar. Reword paragraph 3.18 to read: In order to deal with what is one of the region's major challenges in delivering sustainable growth, a range of transport interventions are needed.

#### Midlothian Health and Care Integration Joint Board

At para 3.12 include health and social care infrastructure in partnership discussions.

#### Neart na Gaoithe Offshore Wind Ltd

Insert new paragraph 3.17 as follows: "The South East area, in particular East Lothian, is of national strategic significance, in that it provides grid connections for a number of major offshore wind farm developments in the outer Firth of Forth, including the Neart na Gaoithe Offshore Wind Farm. Planning permissions relating to terrestrial grid connection infrastructure, afforded national development status by virtue of NPF3, should be safeguarded by LDP policy. With implementation of some planning permissions already underway, major development work is likely early in the SESplan period".

#### North Berwick Community Council

Countryside Around Towns designation to be applied around all the edges of North Berwick (west, east and south) identifying a maximum extent of town. Insert statement that North Berwick is approaching capacity for development. Include the size and location of any replacement new town for Blindwells. Remove North Berwick from Long Term Growth Corridor.

#### Queen Margaret University

Amend paragraph 3.15 to read: "A modified A1 junction and underpass near Queen Margaret University is required as a priority to enable land adjacent to the university to be developed to support the Innovation and Science Cluster. This land also provides opportunities for start-ups with a focus on life sciences, research and learning and food and drink".

#### Crawford and Douglas Ritchie

Add to the end of paragraph 3.10. The priority areas for Strategic Growth and the Long Term Growth Corridors are as follows: 13. South East Edinburgh; Area 18 (A7 / A68 / Borders Rail Corridor); Area 19 (A701 Corridor); Area 21 (East Lothian West); Area 22 (East Lothian Central); and Area 24 (East Lothian East).

#### Savills

Identify the land surrounding the existing employment areas at Fenton Barns, (as shown within Fenton Barns Development Framework Report November 2016, Savills), as an area for Strategic Growth in the period 2018-2030 on Figure 3.2.

### Scottish Power Generation

Replace the third sentence of paragraph 3.16 with: "It remains subject of national development number 3 as defined within NPF3, which also identifies the coastal area from Cockenzie to Torness as an Area of Coordinated Action. Furthermore, NPF3 identifies potential opportunities at the site for renewable energy related investment, whilst also encouraging development that: (i) makes best use of the sites locational assets; and (ii) delivers significant economic benefits.

### SEEDCo

Amend Figure 3.2 to extend the boundary of the Strategic Growth Area 2018-2030 to reflect the boundary of the South East Strategic Development Area identified in current SDP (as identified in SEEDCo Figure 3.2 modification. At the very least the area should be extended to include the Drum Estate.

### Scottish Environment Protection Agency

Amend Figure 3.2 with areas of flood plain and flood risk removed or, if included, with proposals for actions which will avoid increased flood risk to or from sites to which development is being directed.

### Shawfair LLP

Amend Key Diagram 3.1 to reflect the growth potential of Shawfair, over and above that already consented via the existing planning permission and allocation.

### Shepherd Offshore (Scotland) Ltd

Delete the words 'likely to be' from paragraph 3.18.

### Wallace Land Investment and Management

Add to the end of paragraph 3.10. "The priority areas for Strategic Growth and the Long Term Growth Corridors are as follows: 13. South East Edinburgh; Area 18 (A7 / A68 / Borders Rail Corridor); Area 19 (A701 Corridor); Area 21 (East Lothian West); Area 22 (East Lothian Central); and Area 24 (East Lothian East)." Add to the end of paragraph 3.13 "The location for this new settlement should be in Area 22 East Lothian Central around Drem and Fenton Barns." and amend Figure 3.2 and Figure 3.1 accordingly. Amend last sentence of paragraph 3.15 to "Improved capacity and rail services on the East Coast line and new rail stations at East Linton, Drem and Blindwells will help reduce commuting by road."

## **Summary of responses (including reasons) by Planning Authority:**

### **Strategic Growth Areas and Long Term Growth Corridors**

#### Crawford and Douglas Ritchie, SEEDCo, Savills, Wallace Land Investment and Management

SESplan disagree that the Plan should specify priority areas for strategic growth beyond 2030. As required by Scottish Planning Policy (SPP) paragraph 118, the Proposed Plan identifies the amount and broad location of land which should be allocated in LDPs to meet the housing land requirement.

In the SESplan area over the period 2018 - 2030 strategic growth will largely be met by land already identified in existing and proposed LDPs. Figure 3.1 Key Diagram identifies the broad location of this as Strategic Growth 2018 - 2030. Strategic Growth Areas are not the same as Strategic Development Areas (SDAs).

SDAs were required to direct broadly where LDPs should look to allocate the significant level of additional housing land to meet the housing land requirements of SDP1. As is clear in paragraphs 3.1, 3.2, 5.8 to 5.10 and Housing Background Paper Chapter 11, there will be far fewer additional housing land allocations to meet the housing land requirements set out in Table 5.2. At this time, only Edinburgh is expected to potentially require additional house allocations. It will be for the Edinburgh LDP2 project to establish the details including the potential for brownfield development. As set out in paragraph 5.10, for all SESplan member authorities the level of additional housing land to be allocated, if any, will depend on the estimates of housing land at the time of LDP preparation in line with SPP paragraph 117.

Paragraph 5.9 directs Edinburgh to give priority brownfield sites in the urban area within the green belt inner boundary before other sites to meet any shortfall to the Housing Land Requirement when preparing the LDP. Therefore the SDAs in SDP1 are no longer required and have not been carried forward into the Proposed Plan. The broad locations identified as Strategic Growth Areas – the annotations have no exact boundaries - represent land allocated for development in existing and proposed LDPs, including land identified in SDAs in LDPs subsequent to SDP1. Therefore there is no justification for Strategic Growth Areas in Figures 3.1, 3.2 and 3.3 to be extended to cover the Drum Estate or Fenton Barns as none of these locations have development allocations in an adopted LDP. The Drum Estate is not a brownfield site in the urban area within the green belt's inner boundary. References to the Spatial Strategic Assessment that accompanied SDP1 are out of date. The MIR Spatial Strategy Technical note contained an analysis of environmental and infrastructure constraints and capacities by Housing Market Area.

In compliance with SPP paragraph 118, beyond 2030 the Proposed Plan provides an indication of the possible scale and location of housing land as set out in paragraphs 3.3, 3.4, 5.13 and Table 5.3. This refers to growth being directed to locations in and around Edinburgh, locations along Long Term Growth Corridors and settlements within Rural Growth Areas. If required on the basis of future assessments, subsequent strategic plans will identify more specific locations for further strategic growth. **No modifications proposed.**

Barratt and David Wilson Homes, Wallace Land Investment and Management SESplan disagree that the Plan should identify the location for any new settlement in East Lothian. Paragraph 3.13 of the Proposed Plan indicates that subject to future growth requirements for East Lothian in the years 2030 - 2038, there may be a need for a second settlement in the East of East Lothian. Any requirement for this has not yet been established. SPP paragraph 118 only requires SDPs to indicate the possible scale and location of housing land, including by LDP area. The current wording is in compliance with this. Long Term Growth Corridors are identified in the Proposed Plan and any further development requirements for East Lothian will be dispersed to locations further east along the Long Term Growth Corridor. A Long Term Growth Corridor is identified which extends from Musselburgh along the rail line towards Dunbar. **No modifications proposed.**

Shawfair LLP

SESplan disagrees that the Key Diagram 3.1 requires to be amended to reflect the growth potential of Shawfair. The Key Diagram identifies Strategic Growth Areas and Long Term Growth Corridors. It is not the purpose of the Key Diagram to identify the extent of individual sites. Paragraph 3.4 of the Proposed Plan identifies the potential of Shawfair. **No modifications proposed.**

Damhead and District Community Council, Highland Residential Developments,  
Mrs Constance Newbould

SESplan disagree that individual housing sites should be referenced in the Plan. Requirements for and suitability of individual sites for housing development is a matter for LDPs. **No modifications proposed.**

Scottish Wildlife Trust

The Environmental Report, SESplan October 2016 considers the environmental impacts of the Proposed Plan. Density and specific locations for housing development is a matter for the East Lothian LDP. Placemaking principles are set out at Table 3.1 of the Proposed Plan. LDPs will be guided by these principles. **No modifications proposed.**

Ashfield Land, Hargreaves Services, Hargreaves UK Services Ltd

SESplan disagrees that there is a need for the Plan to make clear that housing need should be met through existing settlements and opportunities before a new settlement is considered. Placemaking principles set out in the Proposed Plan at Table 3.1, p16 - 17 guide the location and scale of development. This includes that the re-use or redevelopment of brownfield land should be considered before new development takes place on greenfield land. Paragraph 3.6 of the Proposed Plan requires that LDPs will be guided by the placemaking principles detailed in Table 3.1 of the Proposed Plan and ensure that all international, national and locally designated area are afforded the appropriate level of protection. Assessment of existing settlements to absorb further development will be for the LDP process to assess. The need for a second settlement in East Lothian is subject to future growth requirements. This will be a matter for subsequent SDPs. **No modifications proposed.**

Cockburn Association

SESplan disagrees that paragraph 3.12 of the Proposed Plan should include a review of whether implementation of satellite towns can be brought forward to lessen the housing pressure on Edinburgh. The Proposed Plan strategy provides for most growth to be focussed in and around Edinburgh. The Proposed Plan sets out the housing requirement for each member authority area reflecting housing need and demand as well as infrastructure capacity in line with this strategy. LDPs are required to ensure that there is sufficient supply of land to meet these requirements. Satellite towns could increase commuting and put pressure on transport infrastructure. **No modifications proposed.**

Mactaggart and Mickel Homes

SESplan disagrees that Figure 3.1 Key Diagram should identify a long term growth corridor from Haddington to East Linton and onwards towards Dunbar. Figure 3.1 indicates growth corridors which direct growth to those transport corridors of

primary importance for long term strategic growth. A long term growth corridor is identified from Edinburgh along the rail line through East Linton and onwards to Dunbar. **No modifications proposed.**

North Berwick Community Council

SESplan disagrees that the Plan should include a statement that North Berwick is approaching capacity for development. The spatial strategy identifies broad areas of strategic growth. Within these areas LDPs will identify sites for development. Long Term Growth Corridors direct growth to those transport corridors of primary importance for long term strategic growth. A Long Term Growth Corridor from Drem to North Berwick is identified in the Proposed Plan. This is essential to allow for the possibility of growth being dispersed towards the east where infrastructure and environmental constraints in the west, limit the extent of growth which can be accommodated there. The potential for a new settlement in the east would allow for strategic growth to be accommodated should this prove necessary. This would align with placemaking principles to locate new development near existing public transport hubs or in locations where there are planned infrastructure projects to enable easy access to the public transport network, by utilising Drem station. Any LDP allocations reflecting the potential to locate growth in the east would be subject to site assessments and infrastructure / environmental considerations, including increased rail capacity. **No modifications proposed.**

SESplan disagrees that the Plan should set out the size and location of a replacement new town for Blindwells. The spatial strategy identifies broad areas of strategic growth, it is not site specific and any replacement would be a matter for the LDP. **No modifications proposed.**

SESplan disagrees that the Plan should apply a countryside around towns designation to North Berwick. Countryside around towns policy is intended to protect areas of land to guide rather than to prevent development and is a matter for LDPs. **No modifications proposed.**

Mr Andrew Watt

Figure 3.1 of the Proposed Plan identifies the broad location of existing green belt. LDPs are required to identify and maintain green belts and other countryside designations where they are needed. Placemaking Principles set out in the Proposed Plan at Table 2.1 guide the location and scale of development. This includes that the re-use or redevelopment of brownfield land should be considered before new development takes place on greenfield land, including Prime Agricultural Land and other land important for food production. Paragraph 3.6 requires that LDPs will be guided by the Placemaking Principles detailed in Table 3.1 and ensure that all international, national and locally designated area are afforded the appropriate level of protection. This issue is covered further under Issue 2.2 Green Belt and Related Designations. **No modifications proposed.**

Musselburgh Conservation Society (927996)

The Spatial Strategy Key Diagram, Figure 3.1 and Figure 3.2 South East identify areas of Strategic Growth. This includes Leith Waterfront and West Edinburgh. Figure 3.1 and 3.2 also identify existing green belt. It is the role of LDPs to identify and maintain green belts where needed. **No modifications proposed.**

Cockburn Association (037249)

SESplan disagrees that the Plan should review the compliance of any development at Queen Margaret University with the distinctive placemaking principles. Figure 3.1 of the Proposed Plan identifies the broad location of existing green belts. It is the role of LDPs to identify and maintain green belts. The Proposed Plan requires that green belt is identified and protected to maintain the identity, character and landscape setting of settlements and prevent coalescence. LDPs will be guided by the placemaking principles set out at Table 3.1 of the Proposed Plan. **No modifications proposed.**

SESplan disagrees that the Proposed Plan should include an action to review the opportunities for housing at Leith Docks. The Proposed Plan identifies broad areas of strategic growth. It is the role of the LDP to identify sites and the contribution of those sites to housing land requirements. Consideration of capacity for housing at Leith Docks has taken place as part of the Edinburgh LDP process. The Edinburgh LDP sets out the proposals within Leith Docks. **No modifications proposed.**

Scottish Environment Protection Agency

The SESplan Strategic Flood Risk Assessment, October 2016 sets out information on flood risk. An Addendum to the Strategic Flood Risk Assessment has been prepared which identifies potential flooding issues within each of the Key Areas of Change identified in the Proposed Plan. A large part of the south east has been identified within the Forth Estuary Management Strategy 2015 as a Potentially Vulnerable Area for flood risk. The SESplan Strategic Flood Risk Assessment Addendum sets out the main areas of risk and refers to actions contained in the Local Flood Risk Management Plan for the Forth Estuary, June 2016. The Management Plan presents actions to avoid and reduce the risk of flooding within these Potentially Vulnerable Areas.

If the Reporter is so minded, the wording in paragraph 3.10 could be made clearer to reflect that the area includes significant water bodies and the Firth of Forth and that the SESplan Strategic Flood Risk Assessment identifies areas of flood risk. Further assessment of flooding will be required at the local and more detailed planning stages. **No modification proposed.**

Mr Julian Siann

Paragraph 2.5 of the SESplan Strategic Flood Risk Assessment, October 2016 identifies the need for LDPs to consider climate change and sets out likely implications on flood risk due to climate change. An Addendum to the Strategic Flood Risk Assessment has been prepared which identifies potential flooding issues within each of the Key Areas of Change identified in the Proposed Plan. The Edinburgh Waterfront is addressed within the Addendum relating to Key Areas of Change South East. Flood risk assessments have been prepared for sites within Leith Waterfront identified in the Edinburgh LDP, November 2016. The Edinburgh LDP requires that these assessments are reviewed and requires that for proposals within the Granton Waterfront flood risk assessments will be provided. Viability will be a consideration for the local planning authority in assessing any proposals. **No modifications proposed.**

### Midlothian Green Party

The purpose of Long Term Growth Corridors is to direct growth to those transport corridors of primary importance for long term strategic growth. Placemaking principles guide the location and scale of development. These include that new development should be located near existing public transport hubs, or in locations where there are planned infrastructure projects; that areas should be protected where they are needed to avoid coalescence of settlements; reuse of brownfield land before greenfield land, including Prime Agricultural Land; and that development should be located within a network of green infrastructure. LDPs will be guided by these principles. The Proposed Plan Action Programme sets out: actions to deliver cross-boundary infrastructure and infrastructure of regional importance; actions to help deliver national developments; and actions that require the input and coordination of more than one local planning authority. Actions to deliver infrastructure needed for specific sites is set out in the action programmes related to each of the LDPs in the SESplan area. **No modifications proposed.**

### **Blindwells**

#### Midlothian Health and Care Integration Joint Board

Healthcare is a key element of infrastructure along with education and transport which is specifically identified at paragraph 3.12 in relation to Blindwells. If the Reporter is so minded, the text at paragraph 3.12 could be made clearer to reflect the requirement for the provision of healthcare infrastructure. **No modification proposed.**

#### Wemyss and March Estate / Socially Conscious Capital

In the period to 2030 the East Lothian strategy is not reliant on Blindwells to meet the housing land requirement as the proposed East Lothian LDP contains a range of sites across the county. The Proposed Plan sets out the housing requirement for each member authority area reflecting housing need and demand as well as infrastructure capacity in line with the spatial strategy. LDPs are required to ensure that there is sufficient supply of land to meet these requirements. Blindwells is identified in the East Lothian Proposed LDP as a mixed use allocation including around 1,600 homes. In future East Lothian Council has a vision to expand the new settlement further east to a size of around 6,000 homes. The Proposed LDP safeguards a potential Blindwells Expansion Area. **No modifications proposed.**

#### Taylor Wimpey

Representation seeks clarification of the statement at para 3.12 of the Proposed Plan - "Blindwells could benefit from interventions to accelerate its development". Para 3.12 of the Proposed Plan clarifies this. It states that "further planning studies and close cooperation between landowners and the public sector. In particular, more effective partnership working is needed to deliver the education and transport infrastructure required to unlock its full economic potential..." **No modifications proposed.**

### **National Planning Framework**

#### Cockburn Association

SESplan disagrees that the Plan should include an action to monitor the need for renewables at Leith Docks. Leith Port is included within the Low Carbon /

Renewables East Enterprise Area identified by the Scottish Government and referenced on page 14 of the National Planning Framework. It is considered that the Proposed Plan text at paragraph 3.16 reflects this designation. **No modifications proposed.**

#### Forth Ports Ltd

SESplan disagree that additional text is required at paragraph 3.16 of the Proposed Plan relating to Leith. It is not considered necessary to provide a description of the current use of Leith Port as suggested. The National Planning Framework identifies Freight Handling on the Forth as a national development. This applies to existing and disused ports and harbours on the Forth Estuary and transport access to them. Paragraph 6.14 of the Proposed Plan requires LDPs to support Increased Freight Handling Capacity of Ports on the Forth. In the absence of any specific proposal or assessment of suitability of Leith, particularly in relation to road capacity and air quality impact, it would not be appropriate to include a statement identifying it as a strong location for such use. **No modifications proposed.**

#### Neart na Gaoithe Offshore Wind Ltd

SESplan disagrees with the suggested text. Paragraph 3.16 of the Proposed Plan refers to specific locations within the South East. National Development 4 – High Voltage Electricity Transmission Network - set out in the National Planning Framework is not location specific. Section 16 of the Town and Country Planning (Scotland) Act 1997 Act requires planning authorities to take into account the National Planning Framework in preparing LDPs. It is not necessary for the Proposed Plan to require LDPs to provide safeguards. An enhanced high voltage network is identified within the Proposed Plan Action Programme and required actions are set out. **No modification proposed.**

#### Scottish Power Generation

The National Planning Framework paragraph 3.41 identifies Cockenzie as an area of co-ordinated action. The Proposed Plan refers to this at paragraph 3.16. It is not agreed that the text does not acknowledge the wider aspirations for the site as the text states that "relevant stakeholders should consider a wider range of potential future uses for this site". It is not considered necessary to restate text set out in the National Planning Framework and this is considered to be an appropriate reference.

For clarity if the Reporter is so minded, it could be made clearer within paragraph 3.16 that the former Cockenzie Power Station site is identified as part of the National Development Carbon Capture and Storage Network and Thermal Generation. **No modification proposed.**

#### **Edinburgh BioQuarter**

##### Liberton and District Community Council

Disagree that the reference to the Bioquarter should be removed. The Edinburgh BioQuarter is part of a national Life Sciences Enterprise Area, referenced on page 14 of the National Planning Framework. The Edinburgh LDP, November 2016 identifies the Edinburgh BioQuarter as a Special Economic Area with the main purpose of becoming a centre of excellence for life sciences offering opportunities for academic, commercial and clinical research and development with health care,

teaching facilities and appropriate support services and facilities focused on the Edinburgh Royal Infirmary. The Edinburgh LDP identifies a target floorspace of 245,000sq.m of life science uses and sets out development principles for the site. Development principles include that while supporting uses are appropriate to promote place-making and provide local services and evening and weekend activity the type and quantity of ancillary uses must support, not jeopardise, the overall life science purpose of the BioQuarter. More detailed development principles are set out in draft Supplementary Guidance Edinburgh BioQuarter and South East Wedge Parkland, the City of Edinburgh Council, December 2013, which once adopted will form part of the development plan. The text at paragraph 3.16 of the Proposed Plan is consistent with the Page 3, paragraph 2 of this document sets out development principles which make it clear that while ancillary uses are supported to promote placemaking and provide local services and evening and weekend activity, the type and quantity of ancillary uses must support, not jeopardise, the overall life science purpose of the Edinburgh BioQuarter. It makes clear that floorspace within the Edinburgh BioQuarter should be predominantly specialist buildings for life sciences research and development, teaching, health care and clinical uses as well as directly related commercial life sciences developments. **No modifications proposed.**

#### Edinburgh BioQuarter Partners

SESplan disagree that it is necessary for the Plan to include further acknowledgement of the importance of the BioQuarter by including reference to it being ranked as a top ten location for research and development globally. The text of the Proposed Plan at paragraph 3.16 acknowledges that the BioQuarter, as a key element of the Edinburgh Science Triangle is one of the top ten research and development locations in Europe. It is difficult to quantify the ranking globally. Rankings will change over time and it is considered that the Proposed Plan sufficiently acknowledges the ambition of the BioQuarter. Figure 3.2 identifies the location of business clusters. It identifies an Innovation and Science cluster at the BioQuarter. The location of this cluster on Figure 3.2 is considered accurate. **No modifications proposed.**

#### **Economy**

##### Haddington and District Amenity Society

SESplan disagrees that there is a need for modification to ensure the Plan protects farming, the rural economy and landscape as key assets. SESplan consider that the Proposed Plan sufficiently addresses the rural economy and recognises that landscape is a key asset. Page 4 of the Proposed Plan identifies many of the key natural and historic assets of international, national and regional importance to the area. This includes landscape and cultural heritage. Paragraph 4.12 requires member authorities to support the continued operation, diversification and expansion of rural businesses. **No modifications proposed.**

SESplan disagrees that the Plan should include an initiative to deliver an economy in East Lothian which counteracts the commuter flow. Table 4.1 of the Proposed Plan identifies Significant Business Clusters. Clusters provide opportunities for continued growth and expansion supporting a growing sustainable economy and increasing jobs. An East Lothian Cluster is identified. Paragraph 4.5 of the Proposed Plan requires that SESplan member authorities will promote investment

in this location and LDPs will safeguard land for their future expansion by identifying and safeguarding sufficient land and supporting infrastructure including public transport and walking and cycling provision. LDPs will also consider whether to identify local business clusters which can ensure alignment of employment uses with housing and infrastructure. **No modifications proposed.**

### **Infrastructure**

#### Mrs Mirabelle Maslin (928549)

SESplan disagrees that the Plan should identify infrastructure deficiencies for major sites. The Proposed Plan identifies strategic transport infrastructure required to support the vision. The Action Programme sets out: actions to deliver cross-boundary infrastructure and infrastructure of regional importance; actions to help deliver national developments; and actions that require the input and coordination of more than one local planning authority. Actions to deliver infrastructure needed for specific sites is set out in the action programmes related to each of the LDPs in the SESplan area. **No modifications proposed.**

#### Haddington and District Amenity Society

SESplan disagrees that the Proposed Plan should set an agenda for urgent infrastructure delivery in East Lothian and explain how constraints will be resolved. The Proposed Plan identifies strategic transport infrastructure required to support the vision. The Action Programme sets out actions to deliver cross-boundary infrastructure and infrastructure of regional importance; actions to help deliver national developments; and actions that require the input and coordination of more than one local planning authority. Actions to deliver infrastructure needed for specific sites are set out in the action programmes related to each of the LDPs in the city region.

SESplan disagree that a statement should be inserted into the Plan to explain how constraints in Musselburgh will be resolved. The Proposed Plan states that once development anticipated around Musselburgh is delivered, environmental and infrastructure constraints are expected to limit further significant expansion of settlements in the Musselburgh area. Assessment of the capacity to the east of Musselburgh to absorb further development will be for the LDP process to assess. **No modifications proposed.**

#### Edinburgh Association of Community Councils

Cross-Boundary Green Network supplementary guidance will be prepared for Edinburgh and East. This will involve Midlothian, City of Edinburgh and East Lothian Councils working together to take a plan-led approach to identifying and, where possible, enhancing key green infrastructure around the periphery of Edinburgh. This recognises that it may not always be possible to enhance green infrastructure. It is therefore not appropriate to remove the text as suggested. **No modifications proposed**

#### Queen Margaret University

SESplan disagrees that the Plan should be amended by including a requirement for a modified A1 junction within this section of the Plan. A1 junction improvements are identified at Table 6.1 Strategic Transport Improvements. It is not the purpose

of the Key areas of Change section of the Proposed Plan to set out what the requirements are. **No modifications proposed.**

Cockburn Association

SESplan disagrees that the Plan should set out the case for the A701 relief road. The A701 relief road is necessary to deliver the development strategy in the A701 corridor. The proposal is identified in the Midlothian Proposed LDP. It has been identified through the transport appraisal accompanying the Proposed LDP. **No modifications proposed.**

Edinburgh Association of Community Councils, Grange and Prestonfield Community Council (790304)

SESplan disagrees that the Plan should include reference to the South Suburban Railway as suggested. Re-introduction of passenger services on the south suburban line is not currently considered viable by the rail authority. The Edinburgh LDP safeguards rail halts on the south suburban rail line to ensure development does not prejudice future reuse should this change. It is not considered appropriate for the Proposed Plan to make reference to a review of the benefits of this line in the current circumstances. **No modifications proposed.**

Mactaggart and Mickel Homes, Shepherd Offshore (Scotland) Ltd

As set out in paragraph 6.9, a range of transport infrastructure is needed to support the Vision of the Plan. Strategic improvements that affect more than one SESplan member authority or are likely to have region wide benefits are set out within Table 6.1. If the Reporter is so minded, for consistency and clarity the text at paragraph 3.18 could be made clearer that a range of transport interventions are rather than likely to be needed. **No modification proposed.**

Rosewell and District Community Council

The Proposed Plan identifies strategic cycle routes in Midlothian. Local cycle routes are a matter for the Midlothian LDP. **No modification proposed.**

Wallace Land Investment and Management

SESplan disagrees that para 3.15 should include reference to a new rail station at Drem. Paragraph 3.15 of the Proposed Plan makes reference to new rail stations which are identified as strategic projects within Table 6.1. A new station at Drem is not included within this list of projects. **No modifications proposed.**

SESplan notes nineteen representations of support for this section of the Proposed Plan as well as representations of support for statements relating to strategic growth, welcome an undertaking to address the City Bypass issues and reducing barriers to cycling, the identification of Edinburgh Waterfront as a high priority for growth and the extension of the tram to Leith.

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]

<b>Issue 2.6</b>	Key Areas of Change Edinburgh and West	
<b>Development Plan reference:</b>	<b>Key Areas of Change Edinburgh and West, page 22, para 3.19-3.22 and Figure 3.3</b>	<b>Reporter: [Note: For DPEA use only.]</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Mr. George Adam (037603) Aithrie Estates (032643) Barratt & David Wilson Homes (799597) Cockburn Association (037249) Corstorphine Community Council (929555) Corstorphine Old Parish Church (039627) Cramond and Barnton Community Council (803443) WS Crawford (040107) Edinburgh Association of Community Councils (040476) Hallam Land Management Ltd (037571) Linlithgow and Linlithgow Bridge Community Council (930033)	Mr Mike Martin (798523) Muir Smith Evans (202101) Murray Estates (930087) Musselburgh Conservation Society (927996) Network Rail (928260) New Ingliston Ltd (929755) Park Lane (Scotland) Ltd. (039990) Scottish Environment Protection Agency (790577) Stewart Milne Homes (930082) Taylor Wimpey and Barratt Homes (040609) Wallace Land Investment and Management (930071) Winchburgh Developments Ltd (832800)	
<b>Provision of the Development Plan to which the issue relates:</b>	Key areas of change within Edinburgh and West.	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Mr. George Adam</u> There is no proposed increase in employment sites planned for Linlithgow.</p> <p><u>Aithrie Estates</u> States that section of Plan fails to distinguish between 'Strategic Growth' and 'Growth Beyond 2030'. Objects to paragraph 3.19 which wrongly refers to education issues as one which the developers at Winchburgh must address. This is a matter for the entire Winchburgh / Broxburn / Uphall CDA, with funding by West Lothian Council.</p> <p><u>Barratt &amp; David Wilson Homes</u> Given Livingston's role as principal service centre for West Lothian, a more flexible approach should be provided to allow for further suitable growth. The indication for strategic growth in this location should cover the whole of Livingston.</p> <p><u>Cockburn Association</u> Plan should ensure that there is no coalescence between Winchburgh and Kirkliston. Supports paragraph 3.11. Supports opportunities for housing within</p>		

Leith Docks (Paragraph 3.16).

Corstorphine Community Council

Concerned about the impact of development proposed in the plan on traffic, air pollution, noise and environment, loss of open space and amenity. Concerned that the local infrastructure will prove inadequate.

Corstorphine Old Parish Church

Spatial strategy should have more regard for the large amount of housing land already allocated in West Edinburgh. Concerned that the road infrastructure, particularly the City Bypass and the A8 will not cope with development. Clear access is required to the airport. The Strategic Development Plan (SDP) should ensure essential social facilities are provided simultaneously with the additional housing. Considers that masterplans for large new housing areas are essential. Highlights that half the demand in Edinburgh is for affordable housing and this requires additional government funding. States that there are sites near public transport that would lend themselves to social housing. West Lothian has an over provision of housing land and could absorb demand from Edinburgh. Omit the 10% extra allowance for Edinburgh. Highlights it is important to respect the landscape and allow for pedestrian and cycle paths in the countryside. Public parks and green networks are important.

Cramond and Barnton Community Council

Supports green belt designations around West Edinburgh. Supports proposals to complete River Almond Walkway.

WS Crawford

Where infrastructure solutions can be provided, areas identified as longer term growth corridors should be able to deliver housing in the first period (2018-30). Land at Hatton Mains can provide a sustainable location for strategic growth in order to meet Edinburgh housing land requirements.

Edinburgh Association of Community Councils

The SDP is right to emphasise the importance of this area, but paragraph 3.21 (page 22) is really rather weak. Needs to be early community and spatial planning interventions.

Hallam Land Management Ltd

Seeks strategic support for the longer term growth of the smaller settlements in West Lothian, including Blackburn.

Para 3.21 (page 22) omits the strategic importance of Craigiehall. Fig 3.3 (page 23) is simplistic and fails to recognise the importance of the A90 Corridor which is inconsistent with strategic road improvements set out in Table 6.1 (page 57).

Figure 3.3 omits the potential for rail improvements at Dalmeny. States that the opportunity to enhance landscape character around settlement gateways including a key opportunity for the completion of the River Almond walkway can only be properly delivered through development at Craigiehall.

Linlithgow and Linlithgow Bridge Community Council

Support removal of Linlithgow as area of restraint for housing.

Mr. Mike Martin

Objects to development within Balerno as it does not make good use of areas with access to walking and cycling, and public transport.

Muir Smith Evans

Scotland's National Showground at Ingliston should be specifically recognised in paragraph 3.21, Section 4 and Table 4.1 and included within the West Edinburgh Business Cluster in Figure 3.3.

Murray Estates, Stewart Milne Homes, Taylor Wimpey and Barratt Homes

Does not support the graphical depiction of the spatial strategy in the Key Diagram in Figure 3.1, as it is not reflective of the locations in and around Edinburgh that present sustainable locations for housing. The locations identified for Strategic Growth 2018-2030 are similar or smaller than the Strategic Development Areas in SESplan 1. SESplan 2 does not reflect the modifications made to SESplan 1. The land identified as the Edinburgh and West Strategic Growth Area (SGA) has been reduced compared to that identified within the West Edinburgh Strategic Development Area (SDA) identified in SESplan 1. The vast majority of land to the west of Edinburgh is excluded from the growth area.

There is no basis for Edinburgh Garden District to have been excluded from the West Edinburgh SDA. The Edinburgh and West Strategic Growth Area 2018 - 2030 boundary should be extended to include the land known as Edinburgh Garden District due to its accessibility, infrastructure, land availability and development capacity, Ratho, Kirkliston,

Musselburgh Conservation Society

Direction should be given to the need for regeneration in existing settlements in West Lothian. The Plan should designate new mixed use and mixed tenure communities, on transport corridors, including extensions of the tram, and delivered by public sector. Studies should identify possible locations for new settlements and the mechanisms for their delivery.

Network Rail

The name of 'Gogar Rail Interchange Station' should be changed to 'Edinburgh Gateway Station'.

New Ingliston Ltd

Supports the International Business Gateway forming part of the Edinburgh and West spatial strategy for strategic growth in the period 2018 - 2030 and beyond. Supports the focus on placemaking within the spatial strategy. Welcomes the recognition in paragraph 3.21 to the development of a masterplan. Clarifies that the masterplan will help to deliver development in the short term, as well as long term. Needs to be further recognition and reinforcement of the need to ensure that the masterplan shall include the six principles of placemaking including mixed use. A mono-use business park is not appropriate and would not comply with NPF3 or wider national policy objectives. The Edinburgh Local Development Plan (LDP) examination Reporter's Report confirms that there is capacity within the site for other uses.

Park Lane (Scotland) Ltd.

Para 3.21 omits the strategic importance of Ratho. Fig 3.3 is simplistic and fails to recognise the importance of the Glasgow Road / M8 Corridor which is inconsistent with strategic road improvements set out in Table 6.1. Para 3.3 underestimates the potential for growth from rail improvements at Gogar Interchange and the extension of the tram to Newbridge. States that the opportunity to enhance landscape character around settlement gateways including a key opportunity for the completion of Union Canal can only be properly delivered through development at Ratho North.

Scottish Environment Protection Agency

Object to the Key Diagrams and Figures, as the indicative areas for growth include areas of flood plain and flood risk.

Wallace Land Investment & Management

The spatial strategy, beyond year 12 and up to year 20, should provide an indication of the possible scale and location of housing land, including by LDP. Requests that the Spatial Strategy Assessment of the areas within Edinburgh and West be updated in the light of the proposed spatial strategy prior to examination of the Proposed Plan. The Areas numbered 1 to 30 in Appendix A -The Updated Spatial Strategy Assessment of the Supplementary Guidance Technical Note should continue to be adopted in the Proposed Plan and referred to in paragraph 3.1. This should include the M9, M8 and South West Edinburgh Corridors which should be prioritised in the Key Area of Change Edinburgh and West.

There is no reference in paragraph 3.19 to strategic growth within Linlithgow (Area 6). The emerging LDP allocates substantial growth in this settlement.

The Supplementary Guidance Technical Note (November 2013) identifies that both North West Edinburgh (Area 9) and South West Edinburgh (Area 11) are capable and appropriate to accommodate future growth in Edinburgh.

Figure 3.1 and 3.3 should reference Strategic Growth 2018-30. The rail station at Curriehill has the potential to support Strategic Growth and should be identified in the Proposed Plan (paragraph 3.22).

The Long Term Growth Corridors 2030+ do not identify any location or scale of future growth for the period up to 2038. This should be clarified in paragraph 5.13, explaining the priority areas in each LDP required to meet the estimated 44,000 homes.

Winchburgh Developments Ltd (832800)

The completion of a new railway station is not a key requirement in the delivery of an expanded settlement at Winchburgh. Without a Council led delivery strategy for the non-denominational secondary school at Winchburgh the development strategy of the extant and emerging LDP cannot be implemented resulting in a severe shortfall of housing supply in that Council area.

## **Modifications sought by those submitting representations:**

### Aithrie Estates

Add second line to Paragraph 3.21 (page 22): 'and development within the long term growth corridor'. The paragraph should be renamed paragraph 3.19 and the remaining paragraphs re-numbered. Amend the wording in paragraph 3.19 (page 22) to refer to education responsibilities being entire Winchburgh / Broxburn / Uphall CDA, with funding by West Lothian Council.

### Barratt & David Wilson Homes

Amend Figures 3.1 (Key Diagram, page 13) and 3.3 (South West, page 23) to remove specific blue dotted hatching and replace with dotted circle around whole settlement of Livingston.

### Cockburn Association

Review whether growth proposals comply with Placemaking Principles. Make reference to greater weight being given to the Placemaking Principles during decision making.

### Corstorphine Old Parish Church

10% generosity proposed for Edinburgh housing figure could be omitted.

### WS Crawford

Amend Figures 3.1 (Key Diagram, page 13) & 3.3 (Edinburgh and West, page 23) to identify A71 corridor and land at Hatton Mains for strategic growth.

### Hallam Land Management Ltd

Request that an additional sentence is added to paragraph 3.19 on page 22. 'The smaller settlements in West Lothian may also provide for additional growth through regeneration and new development'. Figure 3.3 Edinburgh and West on page 23 of the Proposed Plan should also be modified to reflect this change, as should the Key Diagram (Figure 3.1) on page 13. Para 3.21 (page 22) should be modified to include Craigiehall. Fig 3.3 (page 23) to recognise the A90 Corridor. Para 3.3 to include rail improvements at Dalmeny.

### Muir Smith Evans

Modify paragraph 3.21, Section 4 and Table 4.1 and the West Edinburgh Business Cluster in Figure 3.3 to include Scotland's National Showground.

### Murray Estates

Amend Figure 3.3 Edinburgh and West (page 23) to extend the boundary of the Strategic Growth Area 2018 to 2030 to the Edinburgh to Glasgow Central railway line as the southern boundary, to include Edinburgh Garden District.

### Musselburgh Conservation Society

No modification specified, representation suggests that growth corridors in West Lothian should be redesignated 'growth and regeneration corridors'. Allocation of land should be redirected from Edinburgh and East Lothian to West Lothian.

#### Network Rail

Change 'Gogar Rail Interchange Station' to 'Edinburgh Gateway Station' in paragraph 3.22 (page 22).

#### New Inghliston Ltd

Requests that the following paragraph be included in the plan (paragraph 3.21, page 22): 'SESplan will support IBG as a development opportunity in the short and long term to establish a successful business-led city extension which fulfils its potential for international investment, new jobs and high quality of place (as per NPF3, page 13) that shall be business led with mixed uses including commercial and residential. The quantum of each use shall be established in subsequent masterplans'.

#### Park Lane (Scotland) Ltd

No modification specified, representation indicates that paragraph 3.21 (page 22) should be modified to include Ratho, and Fig 3.3 be modified to recognise the Glasgow Road / M8 Corridor and paragraph 3.3 to include rail improvements at Gogar and extension of tram to Newbridge.

#### Scottish Environment Protection Agency

Amend Figure 3.3 (page 23) with areas of flood plain and flood risk removed or, if included, with proposals for actions which will avoid increased flood risk to or from sites to which development is being directed.

#### Stewart Milne Homes, Taylor Wimpey and Barratt Homes

The Edinburgh and West Strategic Growth Area should be significantly extended and include Ratho and Kirkliston.

#### Wallace Land Investment & Management

Add sentence to paragraph 3.19 (page 22): 'The priority areas for Strategic Growth and the Long Term Growth Corridors are as follows: Area 6 (M9 Corridor); Area 8 (M8 Corridor); and Area 11 (South West Edinburgh)'. Add sentence to the end of paragraph 3.19 (page 22): 'Linlithgow will accommodate further development to help deliver the upgraded junction to the motorway as set out in the Action Programme'. Add sentence to the end of paragraph 3.22 (page 22): 'There is potential to upgrade Curriehill Station to deliver a transport interchange to support further development at a sustainable transport node'. Paragraph 5.13 (page 47) should be expanded to provide further guidance of the scale and location of growth within the each of the respective LDPs.

#### Winchburgh Developments Ltd (832800)

Amendment paragraph 3.19 (page 22) to read as follows: 'The completion of a new railway station is one element in the delivery of an expanded settlement at Winchburgh in West Lothian, with the potential to accommodate over 3,000 homes and additional employment land. In order to progress the growth of the settlement beyond its first phase, it is for West Lothian Council to now deliver a comprehensive funding solution to enable new education infrastructure that includes Council funding and reasonable and appropriate developer contributions'.

## Summary of responses (including reasons) by Planning Authority:

### Mr. George Adam

Linlithgow is not identified in Table 4.1 (pages 32-33) as a Significant Business Cluster. However, paragraph 4.6 (page 30) highlights that LDPs will also consider whether to identify local business clusters. Identification of clusters at a local level can ensure the alignment of employment uses with housing and infrastructure, including sustainable travel networks. **No modification proposed.**

### Aithrie Estates

SESplan disagree that this section needs to specifically distinguish between 'Strategic Growth' and 'Growth Beyond 2030'. This is set out in the spatial strategy paragraphs 3.1-3.4 (page 12). There is no need for repetition. **No modifications proposed.**

Requirements for the developer of the new school are set out in the planning consent and supporting Section 75 Agreement. The delivery of the new school is to be at developer expense. **No modifications proposed.**

### Barratt & David Wilson Homes, Hallam Land Management Ltd, Murray Estates, Park Lane (Scotland) Ltd, Stewart Milne Homes, Taylor Wimpey and Barratt Homes, Wallace Land Investment & Management

SESplan disagree that the Plan should specify priority areas for strategic growth beyond 2030. As required by paragraph 118 of Scottish Planning Policy (SPP), the Proposed Plan identifies the amount and broad location of land which should be allocated in LDPs to meet the housing land requirement.

In the SESplan area over the period 2018-2030 strategic growth will be largely met by land already identified in existing and proposed LDPs. Figure 3.1 Key Diagram identifies the broad location of this as Strategic Growth 2018-2030. Strategic Growth Areas are not the same as Strategic Development Areas (SDAs). SDAs were required to direct broadly where LDPs should look to allocate the significant level of additional housing land to meet the housing land requirements of SDP1. As is clear in paragraphs 3.1, 3.2, 5.8 to 5.10 and Housing Background Paper Chapter 11, there will be far fewer additional housing land allocations to meet the housing land requirements set out in Table 5.2. At this time, only Edinburgh is expected to potentially require additional house allocations. It will be for the Edinburgh LDP2 project to establish the details including the potential for brownfield development. As set out in paragraph 5.10, for all SESplan member authorities the level of additional housing land to be allocated, if any, will depend on the estimates of housing land at the time of LDP preparation in line with SPP paragraph 117.

Paragraph 5.9 directs Edinburgh to give priority to brownfield sites in the urban area within the green belt inner boundary before other sites to meet any shortfall to the housing land requirement when preparing the LDP. Therefore the SDAs in SDP1 are no longer required and have not been carried forward into the Proposed Plan in that form. The broad locations identified as Strategic Growth Areas – the annotations have no exact boundaries – they represent land allocated for development in existing and proposed LDPs, including land identified in SDAs in

LDPs subsequent to SDP1. Therefore there is no justification for Strategic Growth Areas in figures 3.1, 3.2 and 3.3 to be extended to cover the area known as the Garden District, Ratho or Kirkliston as none of these locations have significant development allocations in an adopted LDP. None of these locations are brownfield sites in the urban area within the green belt's inner boundary. References to the Spatial Strategic Assessment that accompanied SDP1 are out of date. The Main Issues Report Spatial Strategy Technical note contained an analysis of environmental and infrastructure constraints and capacities by housing market area.

In compliance with SPP paragraph 118, beyond 2030 the Proposed Plan provides an indication of the possible scale and location of housing land as set out in paragraphs 3.3, 3.4, 5.13 and Table 5.3. This refers to growth being directed to locations in and around Edinburgh, locations along Long Term Growth Corridors and settlements within Rural Growth Areas. If required on the basis of future assessments, subsequent strategic plans will identify more specific locations for further strategic growth. **No modifications proposed.**

#### Cockburn Association

SESplan disagrees that the Plan should review the compliance of growth proposals with Placemaking Principles. LDPs will be guided by the Placemaking Principles set out in section 3 of the Plan (pages 16-17). The Placemaking Principles are also referenced in the spatial strategy paragraphs 3.5 and 3.6 (page 12). **No modifications proposed.**

#### Corstorphine Community Council

SESplan notes that no modification is requested but responds that for the next 12 years the need for strategic growth will be largely met by land already identified in existing and proposed LDPs. Figure 3.1 Key Diagram (page 13) identifies the broad location of this as Strategic Growth 2018-2030 and includes land in West Edinburgh. The Proposed Plan requires that development should take account of the Placemaking Principles set out at Table 3.1 (pages 16-17). **No modifications proposed.**

#### Corstorphine Old Parish Church

Representations on generosity are responded to under Issue 8 Increasing Housing Delivery. **No modifications proposed.**

#### Cramond and Barnton Community Council

Following consultation at the Main Issues Report, SESplan have rationalised and enlarged the Edinburgh and West Green Network Area to form a larger, cross boundary area which includes the River Almond. **No modification proposed.**

#### WS Crawford

SESplan disagrees that the Key Diagram 3.1 (page 13) and Fig. 3.3 (Edinburgh and West, page 23) require to be amended to reflect the growth potential of Hatton Mains. The Key Diagram and Fig 3.3 Edinburgh and West identify Strategic Growth Areas and Long Term Growth Corridors. It is not the purpose of the Key Diagram to identify the extent of individual sites. **No modifications proposed.**

Edinburgh Association of Community Councils

Paragraph 3.5 of the Proposed Plan (page 12) requires SESplan member authorities to ensure that communities are involved in the design and shaping of development at an early stage. **No modifications proposed.**

Linlithgow and Linlithgow Bridge Community Council

Linlithgow Area of Restraint was raised as an issue in the Main Issues Report for the West Lothian LDP. The Council took the view to remove the restraint approach subject to considerations of landscape impact and availability of infrastructure being appropriately addressed in any development strategy / site allocations which came forward. This position is set out in paragraphs 5.63 – 5.67 of the Proposed West Lothian LDP. **No modifications proposed.**

Mr. Mike Martin

For the next 12 years the need for strategic growth will be largely met by land already identified in existing and proposed LDPs. Figure 3.1 Key Diagram (page 13) identifies the broad location of this as Strategic Growth 2018-2030. This does not include Balerno. Beyond 2030 growth will be directed to locations in and around Edinburgh, locations along Long Term Growth Corridors and settlements within Rural Growth Areas. Balerno is not located on a Long Term Growth Corridor or within a Rural Growth Area. **No modifications proposed.**

Muir Smith Evans (202101)

SESplan disagree that Scotland's National Showground at Ingliston should be specifically recognised in paragraph 3.21 (page 22) and Figure 3.3 (page 23). Scotland's National Showground is referred to as part of the West Edinburgh Business Cluster in Table 4.1 (page 33). **No modifications proposed.**

Musselburgh Conservation Society

The spatial strategy identifies Strategic Growth Areas and Long Term Growth Corridors in West Lothian. Long Term Growth Corridors direct growth to those transport corridors of primary importance for long term strategic growth. For the next 12 years the need for strategic growth will be largely met by land already identified in existing and proposed LDPs. Placemaking principles set out in Table 3.1 of the Proposed Plan (pages 16-17) include that the re-use or re-development of brownfield land should be considered before new development takes place on greenfield land. The identification of individual sites for development will be a matter for the respective LDPs. **No modifications proposed.**

Network Rail

The name in the Proposed Plan reflects the location of the station. **No modification proposed.**

New Ingliston Ltd

SESplan disagree that there is a need to insert the requested paragraph to the plan, the IBG forms part of the West Edinburgh Business Cluster which the plan supports in Section 4. **No modifications proposed.**

Park Lane (Scotland) Ltd. (929755)

SESplan disagrees that Figure 3.3 (page 23) should recognise the M8 Corridor.

Figure 3.1 (page 13) indicates growth corridors which direct growth to those transport corridors of primary importance for long term strategic growth. **No modifications proposed.**

SESplan disagrees that Paragraph 3.3 (page 12) should include rail improvements at Gogar and extension of tram to Newbridge. These are referred to in paragraph 3.22 (page 22). **No modifications proposed.**

#### Scottish Environment Protection Agency (790577)

The SESplan Strategic Flood Risk Assessment, October 2016 sets out information on flood risk. An Addendum to the Strategic Flood Risk Assessment has been prepared which identifies potential flooding issues within each of the Key Areas of Change identified in the Proposed Plan. A large part of Edinburgh and West has been identified within the Forth Estuary Management Strategy 2015 as a Potentially Vulnerable Area for flood risk. The SESplan Strategic Flood Risk Assessment Addendum sets out the main areas of risk and refers to actions contained in the Local Flood Risk Management Plan for the Forth Estuary, June 2016. The Management Plan presents actions to avoid and reduce the risk of flooding within these Potentially Vulnerable Areas.

If the Reporter is so minded, the wording in paragraph 3.21 could be made clearer to reflect that the area includes significant water bodies and that the SESplan Strategic Flood Risk Assessment identifies areas of flood risk. Further assessment of flooding will be required at the local and more detailed planning stages. **No modification proposed.**

#### Wallace Land Investment and Management

SESplan disagrees that a sentence should be added to paragraph 3.19 (page 22) to include Area 6 (M9 Corridor) and Area 8 (M8 Corridor). Figure 3.1 (page 13) indicates growth corridors which direct growth to those transport corridors of primary importance for long term strategic growth. **No modification proposed.**

SESplan disagree that paragraph 3.19 (page 22) should recognise Linlithgow for future growth. While a not insignificant allocation of land for housing has been provided for in the West Lothian LDP this is not regarded as constituting strategic growth and there is consequently no need for any revision to be made to paragraph 3.19, Figures 3.1 and 3.3. Residential development in Linlithgow, and the environmental consequences of this, is to be mitigated by a number of initiatives including the construction of new slip roads onto the M9 and land has been safeguarded in the West Lothian LDP to facilitate this. The upgrading of M9 Junction 3 is not predicated on new housing. As set out in paragraph 5.8, based on current housing land estimates West Lothian Council is not expected to be required to allocate additional housing land in its subsequent LDP to meet the housing land requirement. **No modifications proposed.**

SESplan disagrees that paragraph 3.22 (page 22) should include reference to the potential to upgrade Curriehill Station. For the next 12 years the need for strategic growth will be largely met by land already identified in existing and proposed LDPs, which do not identify the requirement to upgrade this station. Beyond 2030 growth will be directed to locations in and around Edinburgh, locations along Long Term

Growth Corridors and settlements within Rural Growth Areas. **No modifications proposed.**

SESplan disagrees that Paragraph 5.13 (page 47) should be expanded to provide further guidance of the scale and location of growth within the each of the respective LDP areas. Allocations are to be made in LDPs being prepared after the next SDP, in line with the spatial strategy. The next SDP will identify more specific locations for these to be met in line with the spatial strategy. **No modifications proposed.**

Winchburgh Developments Ltd

The delivery of the new station is identified as a Strategic Project 2018-2030 and a new rail station was a named component of the 2009 West Lothian LDP. This helped to underpin the decision to allocate significant new housing in this location. The new station will connect the strategic growth at Winchburgh to the wider region. **No modifications proposed.**

Requirements for the developer of the new school are set out in the planning consent and supporting Section 75 Agreement. The delivery of the new school is to be at developer expense. **No modifications proposed.**

SESplan notes seven representations of support for this section of the Proposed Plan as well as representations of support for Edinburgh meeting a larger proportion of the region's housing needs along transport corridors, the construction of a new railway station at Winchburgh, extension of the Edinburgh Tram to Newbridge, and the reservation of potential route extensions to Livingston and strategic growth to the east and west of Livingston.

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]

<b>Issue 2.7</b>	<b>Key Areas of Change – Fife</b>	
<b>Development Plan reference:</b>	<b>The Spatial Strategy, Key Areas of Change Fife, pages 24 – 25, para 3.24 – 3.28</b>	<b>Reporter: [Note: For DPEA use only.]</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Mr Keith Bedborough (856480) Forth Ports Ltd (929573) I and H Brown (039375) Musselburgh Conservation Society (927996) Mrs Susan Hunter (039853) Mr Bill Livingston (030023) Mrs Mirabelle Maslin (928549) Mrs Debra Nixon (031941)	RSPB Scotland (031480) Cllr Mike Shirkie (038796) Scottish Government (034404) Scottish Wildlife Trust (038549) ScottishPower Generation (034698) Shepherd Offshore (Scotland) Ltd (038954) South Dunfermline Community Council (039583)	
<b>Provision of the Development Plan to which the issue relates:</b>	The Spatial Strategy - Key Areas of Change and Fife.	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Mr Keith Bedborough</u> Support for Key Areas of Change Fife but seeks clarification on paragraph 3.26, with more clarity on the south eastern boundary of Dunfermline and clarification on whether the Eastern Expansion of Dunfermline is now complete.</p> <p><u>Forth Ports Ltd</u> The Port of Methil and the Port of Kirkcaldy should be identified in the Proposed Plan as Forth Coast Cluster locations. Seeks re-wording of paragraph 3.25 to differentiate proposals at Rosyth from provision of additional freight handling capacity on the Forth, i.e. elsewhere at existing ports.</p> <p><u>I and H Brown</u> Seeks to identify land to south west of Kelty as an area identified for strategic growth, including residential and employment land.</p> <p><u>Musselburgh Conservation Society</u> The Proposed Plan should make provision for regenerating Fife's mining towns and should also include scope for one or more new settlements in Fife.</p> <p><u>Mrs Susan Hunter</u> Seeks clarification on boundaries of development to the east of Dunfermline, in particular the eastern expansion.</p> <p><u>Mr Bill Livingston</u> Proposed Halbeath/Kingseat housing development requires to be carefully phased</p>		

in line with road infrastructure to avoid congestion.

Mrs Mirabelle Maslin

Paragraph 3.28 should be revised to make this more precise and to ensure this aim does not become side-lined.

Mrs Debra Nixon

Supports the aim of a Green Network Priority Area close to Dunfermline, and the opportunities/aims 'to strengthen the landscape setting of the settlement to the north and west and provide a more joined up walking and cycling network providing access to Townhill Country Park.' Questions route of any northern relief road including potential loss of green space and biodiversity/wildlife impact.

RSPB Scotland

Should make more reference to nature, habitat and protected areas. Representation also seeks for St Margaret's Marsh SSSI to be given due consideration as part of any development at Rosyth Waterfront.

Cllr Mike Shirkie

Seeks amendments to wording of paragraphs 3.24 and 3.25 of the Spatial Strategy in relation to the Forth Bridgehead area and Rosyth Waterfront.

Scottish Government

Proposed plan should be modified to have greater consistency with reference to Scottish Government supported task forces, and in the case of Fife, the Fife Economy Partnership.

Scottish Wildlife Trust

Insufficient detail on biodiversity in relation to proposed Green Network Priority Areas (paragraph 3.28).

ScottishPower Generation

Key Areas of Change Fife does not take account of NPF3 policy relating to the former Longannet Power Station.

Shepherd Offshore (Scotland) Ltd

Support for the plan identifying the Forth Bridges as a gateway to employment and business. Support is also noted for the plan's focus on Fife, in particular strategic growth in Dunfermline, and representation also promotes site at Halbeath. Plan should go further to offer support to allocated sites which have infrastructure constraints. Recommends that the findings of the review of the planning system be considered during preparation of the proposed plan.

South Dunfermline Community Council

General support for Key Areas of Change Fife but seeks clarification on paragraph 3.26 and whether the Eastern Expansion of Dunfermline is now complete.

**Modifications sought by those submitting representations:**

Mr Keith Bedborough, South Dunfermline Community Council

Modify paragraph 3.26 to include more clarity on the south eastern boundary of Dunfermline and clarification on whether the Eastern Expansion of Dunfermline is now complete.

Forth Ports Ltd

Modify paragraph 3.25 to read as follows: 'However, if the plan's vision is to be delivered in full, it is important that Fife's social and economic needs continue to be met locally, where possible, in order that the area's towns can continue to thrive and the need to travel to employment is reduced. Rosyth Waterfront, the Port of Burntisland, the Port of Kirkcaldy, the Port of Methil and Energy Park Methil [part of the Forth Coast Cluster] provide a range of business opportunities, including renewable manufacture and servicing, as well as other port related operations. Potential exists for the development ~~Improvements to the port at Rosyth will provide some~~ of some additional Freight Handling Capacity on the Forth [a National Development] needed in relation to the heavily used North Sea freight shipping routes at Rosyth Waterfront. Further environmental assessment work is currently being carried out to support the marine consents needed to progress ~~this~~ work related to proposals at Babcock Rosyth.'

Modify Figure 3.4 to identify the Port of Kirkcaldy and the Port of Methil as Forth Coast Cluster locations.

I and H Brown

Add direct reference to land at Kelty South West as a strategic growth area to paragraph 3.27.

Add land to South West of Kelty as an area of strategic growth to Figure 3.4.

Mrs Susan Hunter

No modification specified, however, representation requests clarification from the proposed plan on boundaries of development to the east of Dunfermline, in particular the eastern expansion.

Mr Bill Livingston

Proposed Halbeath/Kingseat housing development requires to be carefully phased in line with road infrastructure to avoid congestion.

Mrs Mirabelle Maslin

Paragraph 3.28 should be revised to make this more precise and to ensure this aim does not become side-lined.

Musselburgh Conservation Society

No modification specified, however, Key Areas of Change Fife section of the plan should be modified to make provision for regenerating Fife's mining towns and should also include scope for one or more new settlements in Fife.

Mrs Debra Nixon

No modification is specified, however the representation seeks that any new northern relief road for Dunfermline avoids Townhill village and specifically Townhill Park.

#### RSPB Scotland

Modify Key Areas of Change Fife (paras 3.24 – 3.28) to highlight the need to consider biodiversity impacts on the key areas of change.

#### Cllr Mike Shirkie

Delete paragraph 3.24 and insert following: 'The Forth Bridge, the Forth Road Bridge and the soon to be completed Queen's Crossing provide a unique gateway to Fife and are key to employment and business. This coupled with the City Region Deal and other initiatives will ensure that Fife continues to prosper. The award of World Heritage status to the Forth Bridge adds a further dimension to this unique site of three bridges spanning the Forth, built in three different centuries.'□

Modify existing paragraph 3.25 and insert 'mixed use including tourism' to line 10, to read as follows: 'However, if this plan's vision is to be delivered in full, it is important that Fife's social and economic needs continue to be met locally, where possible, in order that the area's towns can continue to thrive and the need to travel to employment is reduced. Rosyth Waterfront, Burntisland Port and Energy Park Methil (part of the 'Forth Coast Cluster') provide a range of business opportunities, including renewables manufacturing and servicing and mixed use including tourism'.

Delete existing third line of paragraph 3.25 and replace with the following: 'Such is the size and scope of the Rosyth Waterfront site it can readily accommodate both mixed use and port related industrial development. Projects are in hand to develop additional Freight handling capacity. Mixed use development will allow the development of tourism, a recognised growth area in our economy, thus taking maximum advantage of this unique site'.

#### Scottish Government

Modify paragraph 3.27 to add new second sentence as follows: 'There is also a need to support economic growth and employment creation, with particular focus on delivery of an agreed economic recovery plan for the Glenrothes and Central Fife sub-region. This is being taken forward by the Fife Economy Partnership.'

#### Scottish Wildlife Trust

Paragraph 3.28 should be modified to add greater detail on the biodiversity elements of proposed Green Network Priority Areas.

#### ScottishPower Generation

Add the former Kincardine Power Station as a Forth Coast Cluster (Figure 3.4).

Add new first line of paragraph 3.27 to read as follows: 'Whilst electricity generation at Longannet Power Station recently ceased, the site retains a national development designation within NPF3, encouraging continued baseload generation. Proposals for such development should be supported, as should any development consistent with policy emerging from any NPF review during the lifetime of SESplan.'

Shepherd Offshore Scotland Ltd

No modifications specified, representation indicates further support should be given by the Proposed Plan for sites where there are infrastructure constraints.

**Summary of responses (including reasons) by Planning Authority:**

**Economy/Employment**

Scottish Government

The Fife Economy Partnership plays a role in conjunction with the Scottish Government, private sector businesses and Fife Council in setting economic development priorities and identifying priority areas for investment within Fife. If the Reporter is so minded, in the interests of clarity and to reflect the existing position in central Fife, proposed plan text could be made clearer in paragraph 3.27 by addition of a new second line to read as follows: There is also a need to support economic growth and employment creation, with particular focus on delivery of an agreed economic recovery plan for the Glenrothes and Central Fife sub-region. This is being taken forward by the Fife Economy Partnership. **No modification proposed.**

**Environment, Biodiversity and Green Networks**

Mrs Mirabelle Maslin, Scottish Wildlife Trust

Disagree with proposed modification. The Enhanced Green Networks section of the plan (paragraphs 5.20 – 5.21) outlines clear guidance to member authorities on this issue. Paragraph 5.20 directs 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 states 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'. SESplan consider this provides sufficiently clear detail to suitably direct LDP's and to expand on paragraph 3.28. **No modification proposed.**

RSPB Scotland

Disagree with proposed modification. Development guidelines in relation to SSSI can be found in other legislation, including SPP, which there is no requirement to repeat in the Proposed Plan. The Placemaking Principles of the plan makes a clear direction that the contribution of the natural and historic environment to making distinctive places should be maximised. Environmental impacts of specific development proposals will be assessed by the LDP process through planning applications and/or site masterplans where appropriate. In addition, FIFEplan is supported by a Habitat Regulations Assessment which screens and assesses policies, proposals and sites where required. **No modification proposed.**

**Energy, Infrastructure and Transport**

Mr Bill Livingston

No modification is specified, but representation states that proposed

Halbeath/Kingseat housing development requires to be carefully phased in line with road infrastructure to avoid congestion. This is not a comment on a strategic development plan matter, and is more related to the LDP and site masterplan. The Masterplan is required to have reference to a list of detailed requirements which address phasing and strategic and local road improvements. In addition, in the Examination Report of FIFEplan, a further statement was recommended for inclusion to the plan as follows: "To address concerns about the effect of development on the transport network, including Halbeath Road corridor, Kingseat Road (railway level crossing), Whitefield Road, Townhill Road and East Baldrige Drive, transport assessments for each individual development must be carried out. The assessments will not be confined to the locations just mentioned but will consider the effects on the whole of the transport network. The assessments must include the effects of traffic on air quality. The assessments must identify mitigation measures needed to maintain the efficiency of the transport network and to avoid unacceptable effects on air quality." SESplan consider the above provides a clear response to this issue. **No modification proposed.**

Mrs Debra Nixon

No modification is specified, however the representation seeks that any new northern relief road for Dunfermline avoids Townhill village and specifically Townhill Park. FIFEplan identifies an indicative route; a detailed alignment will be defined through the planning applications for the associated developments. FIFEplan will identify Green Network Priorities for this proposal. **No modification proposed.**

Shepherd Offshore (Scotland) Ltd

Development is required to deliver necessary infrastructure alongside development. Individual authorities assess local development infrastructure requirements, including health, education and transport. Where it is identified that new development will have an impact on infrastructure it is the responsibility of the developer to ensure that this impact is mitigated. It is not the responsibility of individual local authorities to fund the mitigation of new development, or fund in advance of development. **No modification proposed.**

**Plan Designations**

Mr Keith Bedborough, Mrs Susan Hunter, South Dunfermline Community Council

The planned Dunfermline Eastern Expansion is not complete. FIFEplan sets out the settlement boundaries and the settlement plan for Dunfermline. **No modification proposed.**

Forth Ports Ltd

Disagree with proposed modifications. Disagree with requirement to have separate Forth Coast Cluster designations separating Port of Methil with Energy Park Methil. Energy Park Methil Significant Business Cluster is intended to include the Port of Methil. Disagree with insertion of 'as well as other port related opportunities' - the text clearly allows for a range of flexible uses with a focus on economic activity and growth, including a clear direction to member authorities that 'Local Development Plans will adopt a flexible approach to allow for new long term employment opportunities (paragraph 4.5). This is also further expanded on by text in Table 4.1 Significant Business Clusters which outlines the range of opportunities considered appropriate in Forth Coast Cluster locations. **No modification proposed.**

### I and H Brown

Disagree with proposed modification. Although land at Kelty South West is not identified in Figure 3.5 as a Strategic Growth Area, this does not prohibit consented development from taking place there – Kelty South West is an allocated site in Proposed FIFEplan (site reference KEL 005) and a planning application is before the Council for the development of this allocated site. Important to note that the Strategic Development Plan highlights areas of Strategic Growth and Rural Growth Areas within Fife, but does not prohibit development in other areas from being put forward for consideration through the LDP programme. **No modification proposed.**

### Musselburgh Conservation Society

Disagree with proposed modifications. Important to note that the Strategic Development Plan highlights areas of Strategic Growth and Rural Growth Areas within Fife, but does not prohibit development in other areas. In relation to a new settlement for Fife, 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 Fife Housing Land Requirement. Therefore it is currently estimated that the next Fife LDP will not be allocating additional housing land. In relation to regenerating Fife's mining towns, SESplan notes the response and acknowledges the need to support economic growth and employment creation. Location specific programmes within Fife are being taken forward by the Fife Economy Partnership. **No modification proposed.**

### ScottishPower Generation

Disagree with proposed modification. Longannet Power Station is identified as a Forth Coast Cluster and the Proposed Plan clearly supports a range of uses in this location (see Table 4.1 Significant Business Clusters). The text specifically highlights that 'Subject to a review of the National Planning Framework, locations at the former Longannet and Cockenzie power station sites may have potential for a wider range of uses.' The site of the Former Kincardine Power Station has not been identified as a Forth Coast Cluster, but this does not prevent development from taking place in this location. **No modification proposed.**

### **Fife Spatial Strategy**

#### Cllr Mike Shirkie

Disagree with proposed modification. It is too early to predict the impact of a City Region Deal. The Forth Rail Bridge and its World Heritage Site status has been referenced under the SESplan Assets section of the Proposed Plan. The Forth Bridges have been acknowledged by the plan as a key gateway to employment and business.

Disagree with proposed modification. SESplan considers the plan text clearly allows for a range of flexible uses with a focus on economic activity and growth, and that this could include tourism where appropriate. This is also expanded by Table 4.1 Significant Business Clusters which outlines the range of uses and opportunities at Forth Coast Cluster locations, including Rosyth Waterfront. It is noted that the reporter considering this matter in the recent FIFEplan examination (published November 2016) found no reason to make changes to the Proposed

Local Development Plan. Reference was made to Policy 2 of the approved SESplan which says that development of mixed communities on strategic employment sites may be appropriate but noted that this does not endorse such development in all instances. For reasons given below, the reporter found that a mixed-use development of the kind put forward in the representation would not be appropriate on the representation site.

Disagree with proposed modification of third line of paragraph 3.25. SESplan do not support the addition of mixed use to text relating to Rosyth Waterfront. Text in the plan, including Table 4.1 Significant Business Clusters clearly allows for a range of flexible uses with a focus on economic growth. **No modification proposed.**

15 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.]

<b>Issue 2.8</b>	<b>Key Areas of Change – Scottish Borders</b>	
<b>Development Plan reference:</b>	<b>The Spatial Strategy, Key Areas of Change Scottish Borders, pages 26 – 27, para 3.29 – 3.34</b>	<b>Reporter: [Note: For DPEA use only.]</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
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&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)	
<b>Provision of the Development Plan to which the issue relates:</b>	The Spatial Strategy - Key Areas of Change and the Scottish Borders.	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Amber Real Estate</u> Figure 3.5 should be modified to include Greenlaw as a Rural Growth Area.</p> <p><u>Campaign for Borders Rail</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</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</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</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

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

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&H Group Plc

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

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

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

Mrs Joyce McLean

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

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

Scottish Borders 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

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

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

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

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

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

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

Campaign for Borders Rail

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

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

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

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

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

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&H Group Plc

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

#### Lammermuir Community Council

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

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

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

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

#### Scottish Environmental Protection Agency

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

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

SP Energy Networks

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

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

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, Denholm and District Community Council, Lammermuir Community Council

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

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

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) 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, Cockburn Association, Mr Jon Grounsell, Peebles Community Trust, Mr Charles Strang, Transform Scotland

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

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, 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 & Infrastructure**

Eyemouth Harbour Trust

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

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

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

Disagree with proposed modification. Although Greenlaw is not identified in Figure 3.5 as a Rural Growth Area, this does not prohibit development from taking place through the LDP process. Greenlaw currently contains 3 allocated housing sites and one long term housing site identified in the LDP, as well as 2 mixed use sites and 1 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&H Group Plc

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

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 (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

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 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. 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

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

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. 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.]

<b>Issue 3</b>	<b>Placemaking</b>	
<b>Development Plan reference:</b>	Page 12, paragraphs 3.5-3.6, pages 16-17, table 3.1	<b>Reporter:</b> [Note: For DPEA use only.]
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Mr George Adam (037603)  BP North Sea Infrastructure (040619)  Cockburn Association (037249)  Edinburgh Association of Community Councils (040476)  Eskbank and Newbattle Community Council (891202)  Mr Jon Grounell (786916)  Gullane Area Community Council (037068)  Haddington and District Amenity Society (HADAS) (803807)  Juniper Green Community Council (028859)  Mr Ray Kirk (928384)  Mrs Jennifer Marlborough (024817)  D and L McAuslan (040611)  Mrs Jennifer Marlborough (024817)  Mr Mike Martin (798523)  Mrs Mirabelle Maslin (928549)  Midlothian Green Party (778339)  Moorfoot Community Council (906008)</p>	<p>NHS Lothian Public Health and Health Policy (840024)  National Trust for Scotland (040626)  North Berwick Community Council (035522)  Paths for All (034382)  Peebles Community Trust (810911)  Police Scotland (040584)  Rosewell and District Community Council (790523)  Roslin and Bilston Community Council (790524)  RSPB Scotland (031480)  Rural Renaissance (039402)  Scottish Enterprise (790575)  Scottish Environmental Protection Agency (790577)  Scottish Government (034404)  Scottish Natural Heritage (790587)  Mr Charles Strang (907037)  Trinity Community Council (039995)</p>	
<b>Provision of the Development Plan to which the issue relates:</b>	Placemaking Principles to guide development in the city region.	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Mr George Adam</u>  Placemaking principles includes two headings that require further comment, namely Resource Efficient and Easy to Move Around including the impact of housing in Linlithgow and Winchburgh on school places in the next five years.</p> <p>Plan should be more positive in regard to sustainable housing and renewable energy at the building stage.</p> <p><u>BP North Sea Infrastructure</u>  SDPA should remind planning authorities of requirements for allocations and applications in pipeline areas.</p>		

Cockburn Association

Coalescence of existing settlements should be avoided.

Questions how to successfully apply placemaking principles along linear growth corridors.

General support for placemaking principles, but recommends that residents should be consulted on effects of growth and the optimum size of where they live.

Stronger protection should be given to protect prime agricultural land and to ensure that green land should only be used for development which cannot be accommodated on brownfield land.

Edinburgh Association of Community Councils

Support. Brownfield sites may be suitable for mixed use development and housing at greater densities than greenfield, leading to less land use and closer proximity to jobs and public transport.

Eskbank & Newbattle Community Council

It is to be hoped that objections to proposed developments will be considered valid if these principles are not applied.

The principle that LDPs must be aligned with relevant community plans in paragraph 3.6 is very positive. The Placemaking Principles (Table 3.1) are sound and strongly supported.

Mr Jon Grounell

Landscape should not be relegated to an aspect of place-making. It has greater significance and should be a key driver informing the Plan.

Gullane Area Community Council

Garleton Hills south of Haddington should be included under 'Distinctive'.

Haddington and District Amenity Society

The amount of new housing proposed is too high and high housing demand needs to be balanced against potential negative impacts of over development.

Questions whether a growth corridor in East Lothian is appropriate.

Table 3.1 should be amended to make specific reference to the cultural heritage of the landscape, including the Firth of Forth and the coast.

Juniper Green Community Council

Placemaking along linear transport corridors will be difficult, if not impossible, to achieve successfully.

Mr Ray Kirk

Representation supports the plan's approach to delivering high quality places.

Call for a more holistic approach to developer funding involving local authorities

and central government.

Notes Calderwood development receiving 6 stars in Designing Streets assessment. Representation looks to promote the role of 'exemplar' developments for new housing.

Mrs Jennifer Marlborough

Current and recent development plans for high density housing in Leith, Newhaven and Waterfront area do not comply with Placemaking Principles. High density, multi-storey, unattractive developments in Leith and Waterfront area lack of sympathy or consideration for nearby residents and conservation areas. Lack of Greenspace and communal areas. Pressure on schools and health services, and traffic management.

D and L McAuslan

Support principles. Important to prevent coalescence, maximise contribution of natural and historic environment, protect views and setting, protect public spaces from traffic noise and pollution, consider people before movement of vehicles and provide access to green/open space. Important to apply principles to smaller communities.

Mr Mike Martin

Implementation of principles in developer led system will be difficult. Community needs ability to veto plans.

Mrs Mirabelle Maslin

How can it be assured Principles are upheld.

Contribution of natural and historic environment should be maximised.

Areas of archaeological significance should be protected in the Plan.

A more robust approach required to ensuring developers provide green space.

Midlothian Green Party

Support the Placemaking Principles but there needs to be a stronger incentive for developers to comply with them.

Moorfoot Community Council

Unclear how planning authorities will be able to commit to community engagement.

Unclear how principles will be delivered.

Some principles in MIR not included.

NHS Lothian Public Health and Health Policy

Section would be improved by a specific reference to the Place Standard as a tool to achieve placemaking.

Placemaking principles indicate that development should be located away from functional flood plains and areas of medium to high flood risk. The health impacts of flooding are universally negative in the short and long term. Flood prevention should mitigate against unavoidable risk rather than be adopted as an approach to allow development in otherwise unsuitable locations.

#### National Trust for Scotland

This is limited to micro level plan should recognise a regional perspective including the need for large scale residential and industrial to deliver high quality environments. Plan should address need to enhance and link sites to natural heritage.

#### North Berwick Community Council

Support Placemaking Principles but not the growth corridor to North Berwick.

Essential planners and Reporters have a clear understanding of Placemaking Principles and are willing to apply them to reduce inappropriate development.

Should include Garleton hills under 'Distinctive'.

Urge the Plan to identify and designate a CAT that extends around the entirety of North Berwick (west, south and east).

Many of the elements of the Placemaking Principles including resource efficient and easy to move around cannot be achieved by development in North Berwick.

#### Paths for All

Welcome the adoption of placemaking principles in developing the spatial strategy. Trust that the commitments and principles outlined will be implemented in such a way that they directly influence the location, form and purposes of development throughout the duration of the Plan.

#### Peebles Community Trust

Support principles and specific reference to flood plains.

Welcome the references under paragraph 3.6 to development frameworks, masterplans and design briefs that are aligned with relevant community plans and have been developed jointly with local people.

#### Police Scotland

Consideration should be made to contacting Police Architectural Liaison Officers on development. Encourage adoption of Secured by Design and Crime Prevention Through Environmental Design (REF) and PAN77. Sensible and practical levels of security are essential for the success and sustainability of any development/project. To this end, Police Scotland need to work closely with industry.

#### Rosewell & District Community Council

Do not agree with welcoming principle as in practice developer contributions are going elsewhere.

### Roslin and Bilston Community Council

Neighbourhood Plans could be used for greater involvement of local people. Essential to also involve younger people.

Need structure in place to ensure principles are upheld.

Character of Roslin should be protected.

Use of Brownfield sites before Prime Agricultural Land has not happened in practice. Local authorities overpowered by developers. Development on greenbelt land should not be considered until there are no remaining brownfield sites.

Stricter standards and enforcement required to increase energy efficiency of new developments.

### RSPB Scotland

Opportunity should be taken to introduce biodiversity enhancements.

Should be noted that brownfield sites are often much richer for nature, particularly richer than prime agricultural land and greenfield land. Any development of brownfield sites and concomitant loss of habitat should, therefore, be accompanied by an Environmental Impact Assessment and any loss of biodiversity should be mitigated for by the provision of suitable habitat in new brownfield developments and on suitable sites elsewhere.

All new housing should have high low carbon and green credentials. This should be made clear within the SESplan.

### Rural Renaissance

Development principles should be amended to make reference to the presumption in favour of sustainable development set out in SPP. Should direct LDPs to refer to the 13 measures of sustainability and show how these will be used to assess individual applications. This is particularly important in assessing sites that come forward when there is judged to be a lack of effective housing land. SPP is explicit that in these circumstances the presumption in favour of sustainable development is paramount. This needs to be reflected in SESPlan policy dealing with this issue and it needs to be given greater importance.

### Scottish Environment Protection Agency

Considers Plan does not conform to principle in SPP of avoidance of increased flood risk.

Development should be located away from functional flood plains and areas of medium to high flood risk.

Agree areas of flood plain should be safeguarded for water quality/attenuation and habitat but these are not compatible uses these are functions. Consider recreation a benefit but need clarification that only certain types of recreation may be compatible provided these do not affect storage/conveyance.

Welcome inclusion of Heat Mapping in principle but should include other types of high heat demand including industrial, retail, business and leisure uses. Should also include other types of heat supply including waste or excess heat sources.

Placemaking principles in the proposed plan (table 3.1, page 16) should include the aims and objectives of the Cleaner Air For Scotland strategy (Scottish Government 2015).

Scottish Enterprise

Add introduction to table itself.

Scottish Government

Whilst it is appropriate for LDPs to provide the detailed policy for protecting and promoting the natural and historic environment, it would also be relevant to strengthen the references to the significance of these policy issues for the whole SESplan area.

Scottish Natural Heritage

Concerned Principles too vague and open to interpretation. A more succinct and robust test of requirements is needed to focus relevant Local Development Plans on the key issues related to long term and strategic growth.

Seek greater clarity on public transport, impact on landscape, access to open space and new openspace, strategic green network connections, strategic active travel routes, flooding, local services and community facilities and creation of place.

The use of 'should' leaves actions open for debate.

Placemaking Principles should reference the "Tools for Making Better Places" as set out in paragraph 57 of Scottish Planning Policy.

Highlight the importance of the Proposed Plan in guiding Local Authorities towards utilising Design Frameworks and Development Briefs.

Consider it would also be appropriate to highlight in the plan cross boundary areas where such co-ordination may help guide significant change

Mr Charles Strang

Placemaking principles should include the requirement that all places made should include 'beauty' amongst their characteristics, as was promoted in an earlier Scottish Architecture Policy.

Trinity Community Council

These principles are highly laudable and we commend them but to be meaningful, they must be enforced on the ground.

**Modifications sought by those submitting representations:**

BP North Sea Infrastructure

The Proposed Strategic Development Plan should be amended to refer to the consideration of statutory safety exclusions zones. It is recommended that paragraph 3.6 of the Proposed SESplan is amended to include the following statement: 'The SESplan Assets on page 4 illustrate many of the key natural and historic assets of international, national and regional importance. The specific land take requirements of development will take into consideration statutory safety exclusion zones or health and safety consultation zones.' □

#### Cockburn Association

Paragraph 3.5, Line 4 after 'community' Insert 'As a first step, SESplan member authorities should consult communities on the proposed growth for the Region, Line 5 after 'will' Insert 'then'

Paragraph 3.6, line 5 after 'afforded' Insert 'protection giving greater weight to Placemaking criteria in making decisions'.

#### Table 3.1

Safe and Pleasant, add new bullet point:

'New greenspaces need sensitive landscape design which reflects their countryside heritage and retain views, large open spaces and important features such as trees which mitigate climate change'.

Welcoming, add at the end of the 2nd bullet:

'.....especially provision of play areas, both formal and natural.'

Adaptable, 1st bullet add:

'The enhancement of green networks and green belt for the benefit of people and wildlife is important and adequate resources should be allocated for this work'.

Resource Efficient, add new bullet:

Brown field sites will be given the highest priority as green land should only be used for essential development that cannot be accommodated on brown land.

Add new bullet:

'The climate for Scotland is predicted to become significantly wetter and stormier and guidance should be given on afforestation; flood defences; avoiding building on flood plains; building techniques to minimize flood damage and on places with high winds to help the area adapt to climate change.'

Easy to Move Around, insert new bullet after the first bullet:

'On recreational networks, which are used by a variety of activities (walking, jogging, cycling, horse riding etc.), a code of behaviour for users should be devised and promulgated to contribute to the safety and enjoyment of people e.g. cyclists in particular need to be encouraged to ride responsibly and use their warning bells'.

#### Edinburgh Association of Community Councils

Insert sentence stating that brownfield sites may be more suitable at higher densities, requiring less land take, are closer to employment and support public transport.

Haddington and District Amenity Society

Table 3.1 should be amended to make specific reference to the cultural heritage of the landscape, including the Firth of Forth and the coast.

In relation to Haddington particularly, the Garleton Hills and Traprain Law are essential additions.

Mrs Jennifer Marlborough

Build attractive, less dense properties incorporating village type communities that will accommodate wide range of occupants. Ensure all development plans are tenure blind rather than affordable housing being segregated.

Mrs Mirabelle Maslin

Plan must direct authorities to reject any more such developments and to require the higher standard of design. Contribution of natural and historic environment should be maximised. Areas of archaeological significance should be protected in the Plan.

NHS Lothian Public Health and Health Policy

Include reference to the Place Standard as a tool.

The National Trust for Scotland

This is limited to micro level. Plan should recognise a regional perspective including the need for large scale residential and industrial to deliver high quality environments. Plan should address need to enhance and link sites to natural heritage.

North Berwick Community Council

Wish the Plan to acknowledge and reinforce the need for planners, developers, and the Scottish Government's Reporter Unit, to apply and abide by the place-making principles. Plan should include views around East Lothian. Plan should recognise the significance of gateways to the town and identify, designate and adopt a CAT that extends around the entirety of North Berwick. The Plan needs to acknowledge the limitations of existing public transport hubs and infrastructure to extend public transport to and from North Berwick.

Peebles Community Trust

Easy to move around - strengthen first statement - stronger reference to walking and cycling networks within settlements - involves retro-fitting / upgrading in-settlement systems, particularly in settlements outside the central area.

Rosewell & District Community Council

Facilitate more involvement from the communities and base development on Neighbourhood Plans and not developer demands.

Roslin and Bilston Community Council

Include details on how principles can be achieved in practice.

RSPB Scotland

Biodiversity enhancements incorporated into buildings and other infrastructure

should be referred to in the plan under the place making principle 'adaptable'. Under the 'Resource Efficient' heading, reference to requirement for EIA when building on brownfield land should be added.

Include development of design guidance to ensure that new homes are low carbon and meet high environmental standards. SESplan could set an aspiration for all new homes to meet Code for Sustainable Homes standards.

A biodiversity assessment should be required for brownfield land to ensure that valuable habitats and species are not adversely affected.

#### Rural Renaissance

Amend development principles to make reference to the presumption in favour of sustainable development set out in SPP.

#### Scottish Enterprise

Add introduction to table itself stating: 'Underpinning the overall spatial strategy is the need to achieve good place-making, and this is critical for local and regional economies to perform. High quality mixed-use, compact, walkable neighbourhoods are the fundamental building blocks of communities that engender a strong sense of place. Good place-making can help provide strong added value, in helping to maximise the economic value of land, assist with economic development in attracting and retaining talent, and in delivering positive health and environment outcomes too.'

#### Scottish Environment Protection Agency

The statement should be rephrased to: "Development should be located away from functional flood plains. Functional flood plain is generally defined as areas of medium to high flood risk. Development should also be located away from areas liable to surface water, groundwater or coastal flooding. Vulnerable land uses, such as hospitals and schools need to be located out with the 1:1000 year flood extent." Alternative acceptable rewording is: "Development should be located away from functional flood plains (see glossary) and areas of medium to high risk of flooding from all other sources. More vulnerable land uses such as hospitals, schools, care homes, and critical infrastructure should be located out with the 1:1000 year flood extent".

Resource Efficient bullet 6 should be rewritten as: 'Areas important for flood storage and conveying capacity should be safeguarded for water quality management, flood attenuation, and habitat creation as well as compatible recreational uses.'

Principles should include other types of high heat demand including industrial, retail, business and leisure uses. Should also include other types of heat supply including waste or excess heat sources.

Placemaking principles in the proposed plan (table 3.1, page 16) should include the aims and objectives of the Cleaner Air For Scotland strategy (Scottish Government 2015).

Scottish Government

Add to the end of paragraph 3.6 “Natural and historic assets contribute significantly to the quality of the environment for the plan area and it is important this heritage is protected and promoted across SESplan.”

Scottish Natural Heritage

Strengthen principles generally. Suggest that the principles are reviewed to focus on key issues and what 'must' happen rather than what 'should'.

Mr Charles Strang

Table 3.1 place making principles To this table should be added a requirement that development should also be 'beautiful'.

**Summary of responses (including reasons) by Planning Authority:**

**Long Term Growth Corridors**

Cockburn Association, Haddington and District Amenity Society, Juniper Green Community Council, North Berwick Community Council,

The long term growth corridors, as established through the Proposed Plan Spatial Strategy, are used to direct growth, beyond 2030, to established settlements and locations which have good, or potential for good, public transport access and within acceptable travel times to the city. This ensures new development is sustainable in terms of movement both locally and to the city, that there are established local services and access to wider services and that the impacts on the quality of the natural environment are minimised. They do not allocate development in a linear fashion. SESplan does not therefore consider that the Placemaking Principles are contrary to the Spatial Strategy or long term growth corridors. **No modification proposed.**

**Development and Placemaking Principles and Functional Floodplain**

NHS Lothian Public Health and Health Policy, Scottish Environment Protection Agency

It is noted that it could potentially be interpreted that the principle of development within the strategic growth areas is established through the Spatial Strategy and Key Diagram Figure 3.1. Whilst paragraph 3.6, Placemaking in the City Region, instructs that development should take account of the Placemaking Principles in table 3.1, it is considered however, that further clarification could be provided at strategic level. This would be in order to confirm that areas of growth do not mean that development here will be universally acceptable and that constraints, including flooding, may mean that some sites within growth areas are not suitable for development. This is consistent with the SFRA Addendum (REF).

If the Reporter is so minded, the wording in paragraph 3.6 could be made clearer to reference that any sites within areas of strategic growth will be subject to assessment of a range of considerations such as flood risk in LDPs and at detailed planning stages and that the Resource Efficient Placemaking Principle could reference that development should be located away from functional flood plains and areas of medium to high risk.

It is not, however considered necessary to include additional wording on specific

vulnerable land uses (e.g. hospitals, schools etc.) as these are more appropriate detailed considerations for Local Development Plans.

It is also noted that not all types of recreation will be appropriate in areas important for flood storage, as per Resource Efficient principle bullet 6. It is considered that the use of the word 'compatible' in this bullet implies that not all recreational uses will be appropriate.

**No modifications proposed.**

### **Scottish Planning Policy**

BP North Sea Infrastructure, NHS Lothian Public Health and Health Policy, RSPB Scotland, Rural Renaissance, Scottish Environment Protection Agency, Scottish Natural Heritage, Mr Charles Strang, The National Trust for Scotland

Strategic Development Plans are to be concise documents with no requirement to repeat the contents of Scottish Planning Policy or other elements of national policy. It is not therefore considered necessary to repeat this in relation to the Placemaking Principles.

Reference to the use of the Place Standard tool is made in paragraph 3.5 **No modification proposed.**

### **Application and Delivery of Principles**

Eskbank & Newbattle Community Council, Mr Mike Martin, Mrs Mirabelle Maslin, Midlothian Green Party, Moorfoot Community Council, North Berwick Community Council, Paths for All, Roslin and Bilston Community Council, Scottish Natural Heritage, Trinity Community Council

The Placemaking Principles, by inclusion in the Strategic Development Plan, forms part of the overarching Development Plan for all local authorities. The principles are required under the planning system to be reflected though Local Development Plans and any supporting masterplans, design briefs or guidance and delivered through relevant Development Management decisions. The Principles use of the word 'should' is to ensure there is sufficient flexibility where this is necessary. **No modification proposed.**

### **Land Designations**

Cockburn Association, Mrs Mirabelle Maslin, Roslin and Bilston Community Council, RSPB Scotland, The National Trust for Scotland

The Placemaking Principles support the contribution which historic and natural environments make to the region. Re-use and re-development of brownfield sites is promoted ahead of greenfield land including agricultural land. It is noted that brownfield sites can have greater biodiversity value than some greenfield sites. It is considered that a balanced approach to sustainable development is required across the region and that this approach is promoted through the Placemaking Principles and Green Networks. **No modification proposed.**

### **Place Specific References**

Mr George Adam, Mr Jon Grounsell, Gullane Area Community Council, Haddington and District Amenity Society, Mrs Jennifer Marlborough, North Berwick Community Council, Peebles Community Trust, Mr Ray Kirk, Roslin and Bilston Community Council

The Placemaking Principles make limited reference to specific places in the region. This does not mean that any particular areas are not intended for protection or enhancement. It is considered that Local Development Plans will have the opportunity to be more place specific when applying these principles through masterplans, design briefs and so on. **No modification proposed.**

### **Landscape and Coalescence**

Cockburn Association, Mr Jon Grounsell, D and L McAuslan, Roslin and Bilston Community Council

The Placemaking Principles support the Spatial Strategy in terms of avoidance of coalescence and are considered to form a strong basis by which the character of existing places can be reinforced or enhanced and a strong basis for the creation of new places with unique characters. It is considered that the region's landscape is central to the Placemaking Principles and its importance reinforced by the spatial Strategy. **No modification proposed.**

### **Community Involvement**

Cockburn Association, Eskbank & Newbattle Community Council, Mr Mike Martin, Moorfoot Community Council, Roslin and Bilston Community Council

Consultation and community involvement in shaping the development of places is cited as a requirement in paragraph 3.5 of the Proposed Plan and paragraph 3.6 states that development frameworks, masterplans and design briefs will align with community plans. This provides a basis for community involvement in development which can be implemented by SESplan's member authorities. Further detail would not be considered relevant with the Strategic Development Plan itself.

Consultation on the location and scale of development takes place at a number of different stages in the planning system, including but not limited to SDPs, LDPs, Supplementary Guidance and consultation on major applications. **No modification proposed.**

### **Developer Contributions**

Mr Ray Kirk, Rosewell & District Community Council

The Placemaking Principles are not intended as specific guidance to developer contributions or funding. **No modification proposed.**

### **Detailed Principles**

Mr George Adam, Edinburgh Association of Community Councils, D and L McAuslan, Mrs Jennifer Marlborough, Mrs Mirabelle Maslin, Moorfoot Community Council, Police Scotland, Rosewell & District Community Council, RSPB Scotland, Mr Charles Strang, The National Trust for Scotland

The Placemaking Principles intentionally do not give detail on smaller scale issues, such as specific house design, nor do they contain every aspect which could be considered as an aspect of place.

The need for sustainable buildings with renewable and low carbon technology is noted and location and orientation of development is included in the Placemaking Principles under resource efficient and is also referenced in the Low Carbon Economy section paragraphs 4.24-4.29.

Density is an important consideration for sustainable development and this is reflected in the Supporting Non-Car Travel section of the Proposed Plan (paragraphs 6.1-6.4), however, as different densities are appropriate for different sites, or even different densities over one site, specific detail on density should be considered on a site by site basis.

The nature of the plan means that the principles, whilst reflecting key aspects and important considerations for the region, are strategic in their remit. It is considered that Local Development Plans, design briefs and masterplans will provide the opportunity for more detailed and specific design considerations. **No modification proposed.**

### **Introduction**

#### Scottish Enterprise

The suggested introductory paragraph is noted, however, the suggested addition wording focuses on residential development and economic benefits. The Placemaking Principles and their application are referenced in the Spatial Strategy paragraphs 3.5 and 3.6 (page 12). It is accepted, however, that as these do not directly precede the Placemaking Principles table 3.1 (pages 16 and 17). If the Reporter is so minded, inclusion of a general introduction directly preceding table 3.1 may be beneficial. **No modification proposed.**

### **Natural and Historic Assets**

#### Scottish Government

It is noted that the references to promoting and protecting the natural and historic environment could be strengthened. If the Reporter is so minded, additional wording on natural and historic assets may add clarity to paragraph 3.6, however these are also referenced within the SESplan Assets pages 4-5 and the Placemaking Principles table 3.1. **No modification proposed.**

30 representations in support of the placemaking principles are noted.

#### **Reporter's conclusions:**

[Note: For DPEA use only.]

#### **Reporter's recommendations:**

[Note: For DPEA use only.]

<b>Issue 4.1</b>	<b>Investment and Employment</b>	
<b>Development Plan reference:</b>	Pages 30-35, Paragraphs 4.1-4.15, Table 4.1, Figure 4.1.	<b>Reporter:</b> [Note: For DPEA use only.]
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Mr George Adam (037603)  Cockburn Association (037249)  Cramond and Barnton Community Council (803443)  The Crown Estate (Scotland Portfolio) (039431)  Denholm and District Community Council (040612)  EDF Energy (040462)  Edinburgh Association of Community Councils (040476)  Edinburgh BioQuarter Partners (037370)  Eyemouth Harbour Trust (031900)  Forth Ports Limited (929573)  Grange and Prestonfield Community Council (790304)  Gullane Area Community Council (037068)  Haddington and District Amenity Society (803807)  Hallam Land Management Limited (039805)  Hargreaves Services (038881)  Kelso Community Council (039365)  Lammermuir Community Council (039856)  Liberton and District Community Council (790396)  Linlithgow and Linlithgow Bridge Community Council (930033)  Mrs Mirabelle Maslin (928549)  National Trust for Scotland (040626)</p>	<p>Near na Gaoithe Offshore Wind Limited (034699)  New Ingliston Limited (929755)  North Berwick Community Council (035522)  Park Lane (Scotland) Limited (039990)  Peebles Community Trust (810911)  Peebles and District Community Council (039578)  Prestonpans Community Council (039835)  Queen Margaret University (040312)  Roslin and Bilston Community Council (790524)  RSPB Scotland (031480)  Scarborough Muir Group Limited (929314)  Scottish Government (034404)  Scottish Natural Heritage (790587)  Scottish Power Generation (034698)  Scottish Property Federation (037013)  Scottish Wildlife Trust (038549)  Shawfair LLP (039940)  Shepherd Offshore (Scotland) Limited (038954)  Mr Julian Siann (024823)  Mr Charles Strang (907037)  Taylor Wimpey/Hallam Land (039521)  VisitScotland (029385)  Wallace Land Investment and Management (930071)</p>	
<b>Provision of the Development Plan to which the issue relates:</b>	Locations for investment including significant business clusters and employment land supply.	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Mr George Adam (Number)</u>  Public transport does not serve Linlithgow to West Lothian employment clusters.</p>		

Employment land at Linlithgow lacks access from M9 junction 3.

Cockburn Association (Number)

Consider clusters aspirational and should be monitored so as to not prevent other development such as housing. Clusters should promote conservation and enhancement of areas. Clusters should allow for housing and ensure that allocation of employment land does not prevent brownfield sites being developed for housing as this will have greater benefits to Edinburgh.

Large employment sites must be based on the Placemaking Principles and green belt and greenfield sites such as farmland avoided

Cramond & Barnton Community Council

Proposed Plan does not consider digital economy and increases in home, remote and flexible working. This could reduce commuting and emissions and increase quality of life.

The Crown Estate

Support innovation and science cluster. Land in vicinity of Easter Bush and Bush Estate could accommodate residential development in support of the cluster and include green network linkages.

Denholm and District Community Council

Plan does not consider sufficient locations for investment identified in Figure 3.5 Scottish Borders.

EDF Energy

Support reference to Torness in Table 4.1 but do not see development occurring over longer plan period. Torness working life may be extended beyond 2030 then decommissioning will continue to contribute to economy of region.

Edinburgh Association of Community Councils

Investment should be directed to coexist with housing to reduce commuting, increase sustainability and placemaking. Proposed Plan should reference changes in working patterns.

Plan must be responsive to economic and market changes.

Edinburgh BioQuarter Partners

Paragraph 4.1 should refer to Edinburgh City Region's potential to boost Scotland's competitiveness. Appears reluctance to refer to Edinburgh as key driver of economic growth in region and in Scotland.

Broadly support business clusters but consider a tiered prioritisation approach should be used as per SESplan Main Issues Report. This is to allow resources to be allocated between each cluster and between sites within clusters. Priority should be given to Edinburgh BioQuarter within the clusters.

#### Eyemouth Harbour Trust

Eyemouth Harbour should be included in Forth Coast Cluster as it has potential to host marine energy related activities including offshore wind operations and maintenance. Cluster is noted in Scottish Development International and Scottish Enterprise research (REF). Coastal assets, specifically the port at Eyemouth will need to evolve to meet requirements of marine energy sector.

#### Forth Ports Ltd

Not all sites in Forth Coast Cluster suitable for port development and cluster does not recognise full potential of sites for development. It is not clear where energy or port uses are appropriate. Not a cohesive cluster. Does not represent an Area of Coordinated Action.

The Ports of Methil and Kirkcaldy should be identified as Forth Coast Cluster locations.

#### Grange and Prestonfield Community Council

Plan must be responsive to economic and market changes.

#### Gullane Area Community Council

Lack of business clusters at North Berwick and Haddington suggests that these areas are unsustainable for growth as indicated in the Proposed Plan Spatial Strategy.

#### Haddington and District Amenity Society

Consider that there are no significant employment opportunities identified in East Lothian beyond Musselburgh and that potential work locations in the Forth Clusters need to be complemented by housing and infrastructure.

#### Hallam Land Management Ltd.

Craigiehall not included in West Edinburgh Business Cluster.

In terms of Employment Land 4.13 - 4.15 part of the Craigiehall site has an established use. There is also a commitment that LDP will support ' *diversification and re-categorisation of existing employment sites where this facilitates wider business opportunities mixed use or an increased density of development* .'

#### Hargreaves Services

Seeks that the Westfield Surface Mine be identified in proposed plan as a Significant Business Cluster.

#### Kelso Community Council

Does not support policy as significant business clusters do not include Kelso.

#### Lammermuir Community Council

Would like to see smaller business clusters promoted in the Central Borders.

#### Liberton and District Community Council

Supporting Infrastructure, including transport and education, should be in place to ensure local people benefit from the Bush.

Proposed Plan should mention tourism, particularly in relation to Rosslyn Chapel, and ensure the area's character is not destroyed by development.

The Plan needs to do more to facilitate employment opportunities if it genuinely seeks to reduce travel especially by car.

Paragraph 4.15 should emphasise retaining employment land and resisting other uses such as housing. Paragraphs 4.13-4.15 fail to promote improving existing public transport services to employment sites.

#### Linlithgow & Linlithgow Bridge Community Council

Support significant business clusters but disappointed north West Lothian, such as Linlithgow, is not included. Linlithgow has tourism interest and empty office and retail space. Modification to junction 3 of M9 could make economic development more viable.

#### Mrs Mirabelle Maslin

Questions how paragraphs 4.5 and 4.6 can be delivered with reduced local authority resources and lack of monitoring and enforcement of the current Strategic Development Plan. Considers road and other infrastructure is inadequate to deal with the significant business clusters in table 4.1.

#### The National Trust for Scotland

The focus on Edinburgh as the source of employment is likely to see existing pinchpoints for commuting become still more congested.

#### Neart na Gaoithe Offshore Wind Ltd

Table 4.1 fails to take account of National Planning Framework 3, specifically the Area of Coordinated Action between Cockenzie and Torness.

#### New Ingliston Ltd

West Edinburgh Business Cluster should include reference to housing. This is to align to wider spatial strategy and to be clear to investors about wider opportunities.

Proposed Plan should direct Local Development Plans to ensure International Business Gateway (IBG) site is not compromised by singular employment land allocation.

#### North Berwick Community Council

East Lothian Proposed Local Development Plan does not identify sufficient employment land in North Berwick. There is pressure for existing employment land from housing. Land and property which is underused could be categorised for employment.

#### Park Lane (Scotland) Ltd.

West Edinburgh Business Cluster should include Ratho.

#### Peebles Community Trust

Support local business clusters but the importance of these in supporting sustainable

rural communities is under represented.

Peebles & District Community Council

Strategy fails to identify sufficient opportunities for rural employment.

Prestonpans Community Council

Support inclusion of Cockenzie but note major investment in transport infrastructure is needed to support development.

Queen Margaret University

Support clustering of businesses. Consider inclusion of land adjacent to Queen Margaret University.

Roslin and Bilston Community Council

Local Authorities need to ensure the alignment of employment uses with housing and infrastructure, including sustainable travel networks and ensure infrastructure is in place before development takes place.

Support inclusion of The Bush, but needs support in education, transport and other areas so that local people can benefit. Consider widening and improving the road from Gowkley Moss to The Bush together with the possibility of connecting with the proposed A702 link or another improved local road.

Tourism industry is important in (Midlothian) area and if character is destroyed this will be lost.

RSPB Scotland

The Proposed Plan should ensure significant business clusters do not impact on any adjacent protected areas and wildlife. Support sustainable travel to clusters.

Scarborough Muir Group Limited

Support inclusion of Rosyth harbour in Forth Coast Cluster but description should be amended to include reference to a major mixed use are supporting the majority of use classes including housing. This is due to the sites accessible location, existing investment in infrastructure and remediation work, community support and planning history (submitted as background document). Port use has not proven attractive despite investment and marketing and there is an oversupply of employment land in Fife.

Scottish Government

Proposed Plan should better reflect paragraph 98 in respect of Strategic Centres this would also address paragraphs 95 and 96 in Scottish Planning Policy and pages 12 and 13 in the National Planning Framework.

Should state support for home working and energy efficiency.

Must address paragraph 103 of Scottish Planning Policy regarding issues around take up of employment sites and the need to consider a wider range of uses or alternatives on sites that no longer meet current needs and market expectations.

#### Scottish Natural Heritage

Supports section of Proposed Plan. Consideration should be given to landing sites, grid connections and infrastructure associated with offshore wind farms. Should give a spatial direction for offshore wind developers in advance of a regional marine plan.

#### Scottish Power Generation

Reference to significant business clusters confusing and should be reconsidered. Should refer to National Planning Framework terms including Areas of Coordinated Action (Cockenzie to Torness) and other general direction in National Planning Framework. Relationship between clusters and Areas of Coordinated Action unclear.

Reference should be made to the potential for revised National Planning Framework policy to encourage employment-led regeneration of former national development sites such as Cockenzie, Longannet and former Kincardine Power Stations. Does not take account of current National Planning Framework regarding wider opportunities for Cockenzie.

#### Scottish Property Federation

Shortage of Grade A office space in city centre, lack of low cost office space in central Edinburgh and office space in wider region is not addressed in Proposed Plan. This is vital to attracting businesses and growth.

#### Scottish Wildlife Trust

A high quality environment attracts entrepreneurial talent.

#### Shawfair LLP

Support inclusion of Shawfair in Borders Rail Cluster. Consideration should be given to impacts for housing land supply in the surrounding area.

#### Shepherd Offshore (Scotland) Ltd

Asks that Local Authorities ensure records of land supply are up to date.

#### Mr Julian Siann

Local employment sites, such as small workshops, offices, corner shops, are being reduced as a result of new housing.

#### Mr Charles Strang

Emphasise high quality environment and National Scenic Area in Borders Rail Cluster.

#### Taylor Wimpey/Hallam Land

Support this section of the Proposed Plan. Consider it important to align new housing and infrastructure with all clusters. In particular at the Bush/A701 and site HS16 and extension in Midlothian Council's Proposed Local Development Plan.

#### VisitScotland

Considers that there is an opportunity for growth around tourism in Leith and a tram extension would be a key factor.

### Wallace Land Investment & Management

Plan fails to identify the importance of the tourism economy as a major element of the regional economy.

The City Region Deal is considered to have a material impact on economic growth within the City Region and SDP2 should await the approval of a City Region Deal, in order that the plan can take the City Region Deal more fully into account.

### **Modifications sought by those submitting representations:**

#### Cockburn Association (Number(s))

Add 'support the inclusion of housing within business clusters, where this is appropriate and feasible' to paragraph 4.2. Include the option of compulsory purchase of brownfield land to facilitate the building of affordable housing in paragraph 4.2.

In paragraph 4.13 include a statement that large scale employment sites must be selected based on relevant criteria in the Placemaking Principles and that priority for the selection of employment land should be brownfield sites, preferably within/close to settlements. In paragraph 4.14 include a statement on the management of safeguarded land.

#### Cramond & Barnton Community Council (Number(s))

Proposed Plan should promote flexible working and encourage new homes to provide for home working.

#### Edinburgh Association of Community Councils

Include reference to employment and housing located together.

Include reference to changes in working patterns.

#### Edinburgh Association of Community Councils, Grange and Prestonfield Community Council

Paragraph 4.15 add: Where it is likely that existing employment sites will not be used for other business purposes or housing, opportunities for parkland or open space uses including food production must be explored to avoid blight.

#### Edinburgh BioQuarter Partners

There should be a tiered approach to clusters. Priority should be given to Edinburgh BioQuarter within the clusters.

#### Eyemouth Harbour Trust

Include Eyemouth Harbour in Forth Coast Cluster and add to Figure 4.1. Under Opportunities add "Operations and maintenance for marine energy assets at ports including Eyemouth".

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.'

#### Forth Ports Ltd

Identify ports at Methil and Kircaldy in Forth Coast Cluster. Opportunities to state: 'Cluster of coastal sites providing opportunities for a range of uses, the range of which is dependent upon their physical characteristics. In particular, Port use including such as renewables manufacture and servicing, thermal and low carbon energy generation or other uses associated with the Cockenzie Area of Coordinated Action are identified within the Cluster. These locations also present significant opportunities for innovative reuse and regeneration, making use of the well serviced sites and their coastal locations. Subject to a review of the National Planning Framework, locations at the former Longannet and Cockenzie power station sites may have potential for a wider range of uses. The Ports of Methil, Kircaldy, Burntisland, Rosyth and Leith are operational multi-purpose ports and provide opportunities for a broad range of industrial and port related uses including energy related manufacture and supporting energy related operations.' Amend table 4.1 and figure 4.1 to indicate opportunities in relation to locations identified. Cluster should be expanded to address fully locations where coastal related business development should be supported.

#### Hargreaves Services

Seeks that the Westfield Surface Mine be identified in proposed plan as a Significant Business Cluster (figure 4.1, Significant Business Clusters, page 31).

#### Lammermuir Community Council

Inclusion of smaller business clusters promoted in the Central Borders.

#### Liberton and District Community Council

Including provision of supporting infrastructure at the Bush. Include reference to tourism, including Rosslyn Chapel and protecting the area's character.

Paragraph 4.15 should emphasise retaining employment land and resisting other uses such as housing. Modification not specified, assumed Paragraphs 4.13-4.15 should include reference to improving public transport to employment sites.

#### Neart na Gaoithe Offshore Wind Ltd

Amend table 4.1 to include 'Area of Coordinated Action for East Lothian'.  
Comprising: Onshore infrastructure (cables and substations) for major offshore wind farm developments including Neart na Gaoithe (plus other elements in NPF3).  
Principle Sectors: to include renewable energy. Opportunities: 'Significant plans for offshore wind to the east of the Firths of Forth and Tay, with planning permissions having been granted by East Lothian Council for grid connections for these developments. Afforded national development status within NPF3, East Lothian Council should continue in its support of such developments, safeguarding routes from conflicting developments which might jeopardise delivery.'

#### New Ingliston Ltd

Include specific reference to mixed uses including conference facilities, tourism and residential development under West Edinburgh Business Cluster.

Proposed Plan should direct Local Development Plans to ensure IBG site is not

compromised by singular employment land allocation.

#### North Berwick Community Council

Strengthen protection of employment land particularly in and around North Berwick. Land and property which is under used could be categorised for employment.

#### Peebles Community Trust

Add symbols representing main rural settlements to indicate importance (Figure 4.1).

#### Peebles & District Community Council

Areas not categorised in the Proposed Plan should be zoned for economic use in Local Development Plans where the population is over 500.

#### Queen Margaret University

Table 4.1 reference to Queen Margaret University should state: 'Land adjacent to Queen Margaret University will accommodate the Edinburgh Innovation Park and Commercial Hub, providing opportunities for start-ups, with a focus on life sciences, research and learning and food and drink.'

#### Roslin and Bilston Community Council

Include infrastructure support for The Bush, including that which benefits local people.

Mention importance of tourism industry and character of area.

#### RSPB Scotland

Specific reference should be added to section 4.1-4.7 to ensure potential impacts on nature are considered.

#### Scarborough Muir Group Limited

Amend Table 4.1 under opportunities to 'The Rosyth Waterfront Area also has the potential to accommodate a broader range of mixed use development options to reflect previous planning permissions for the redevelopment of this site.'

#### Scottish Government

Include reference to Strategic Centres in paragraph 4.5. Paragraph 4.7 should be moved to follow paragraph 4.1. Add recognition of Edinburgh being one of Europe's most important sites for financial services and Tourism.

Paragraph 4.6 should state that LDPs should support opportunities for home working, live work units, micro businesses and community hubs as well as integrating efficient energy and waste innovations within business environments.

Paragraph 4.15 add text to state 'where existing business sites are underused reallocation to enable a wider range of viable business or alternative uses should be considered, carefully accounting for any potential impacts on existing business uses.'

#### Scottish Power Generation

Reconsider significant business cluster approach. Take Area of Coordinated Action - Cockenzie to Torness - from Forth Coast Cluster and include separately. Include

former Kincardine Power Station in Forth Coast Cluster. Reference Areas of Coordinated Action throughout section in Proposed Plan.

The former Kincardine Power Station site also should be identified as part of the Forth Coast Cluster (Figure 3.4, page 25).

Add additional paragraph 4.16 'Local Development Plans will encourage employment-led regeneration of major brownfield sites, in particular those referenced within NPF3 and any subsequent NPF review which might occur during the SESplan period.'

Scottish Property Federation

Proposed Plan should address shortage of Grade A office space in city centre and lack of low cost office space in central Edinburgh.

Shawfair LLP

Consideration should be given to impacts for housing land supply in the surrounding area of Shawfair.

Shepherd Offshore (Scotland) Ltd

Asks that that Local Authorities ensure records of land supply are up to date.

Mr Julian Siann

Considers preventing loss of local employment sites to housing should be an objective of the Proposed Plan.

Mr Charles Strang

Emphasise high quality environment and National Scenic Area in Borders Rail Cluster.

**Summary of responses (including reasons) by Planning Authority:**

**Identification of Significant Business Clusters**

Denholm and District Community Council, Edinburgh BioQuarter Partners, Eyemouth Harbour Trust, Forth Ports Ltd, Grange and Prestonfield Community Council, Gullane Area Community Council, Haddington and District Amenity Society, Hallam Land Management Ltd., Hargreaves Services, Kelso Community Council, Linlithgow & Linlithgow Bridge Community Council, Neart na Gaoithe Offshore Wind Ltd, New Ingliston Ltd., Park Lane (Scotland) Ltd., Peebles & District Community Council, Queen Margaret University, Scarborough Muir Group Limited, Scottish Power Generation, The Crown Estate

Significant business clusters have been included in the Proposed Plan as required in SPP paragraph 98. Clusters can include National Renewable Infrastructure Plan (NRIP) sites, Enterprise Areas and other sites which as a group form broad economic locations of regional significance. Sites within clusters also reflect Areas of Coordinated Action and sites within NPF3. The Economy Technical Note, 2015 (REF) and the Main Issues Report, 2015 provide details on sites and cluster identification.

The purpose of the clusters is not to reflect every employment site, industrial site or

business park within the region, only those, which when brought together, form a regionally significant grouping of strategic or cross-boundary importance. Local Development Plans are instructed to identify further local business clusters and will also identify standalone major employment sites.

Proposed Plan paragraph 4.5 instructs Local Development Plans to adopt a flexible approach in relation to long term employment opportunities within the clusters. Identification of sites within clusters does not automatically restrict them to a singular employment land allocation or other specific use allocations. These details will be subject to consideration in Local Development Plans.

Clusters or sites within clusters have also not been individually prioritised. This is to ensure locations for employment have the flexibility and ability to be responsive to economic and market needs. **No modification proposed.**

#### EDF Energy

It is noted that any redevelopment of Torness Power Station site may not be within the plan period but do not consider any changes are required to the Plan as a result. As a working or decommissioned site Torness remains a contributor to the region's economy and relevant to the Forth Coast Cluster. **No modification proposed.**

#### Eyemouth Harbour Trust

Whilst there are opportunities for port use associated with renewable energy at Eyemouth Harbour this is not considered to warrant inclusion in the Forth Coast Cluster at this time. The site does not currently serve this function nor are there known planning proposals at a strategic scale to do so. There is however, a clear statement in paragraph 4.12 of the Proposed Plan which references the potential for Eyemouth Harbour to service offshore wind farms and in addition, Eyemouth has been identified as an area of Strategic Growth 2018-2030. These inclusions are considered sufficient to support future opportunities for Eyemouth Harbour. **No modification proposed.**

#### Forth Ports Ltd

The Proposed Plan includes Methil within the Forth Coast Cluster and indicates that a range of uses can be supported within the cluster without ascribing particular uses to each. The Fife Energy Corridor stretches along the Fife Coast from Methil to Longannet (NPF3, Page 14) however specific sites are not indicated. It is considered that Kirkcaldy Harbour, whilst having existing port uses, is not of a sufficient scale to be included in the Forth Coast Cluster. **No modification proposed.**

#### Hallam Land Management Ltd.

It is not considered that inclusion of Craigiehall as part of the West Edinburgh Business Cluster would be appropriate. The site, whilst providing a former employment use for the Ministry of Defence, does not have a current functioning employment use or planning permission for any further employment use. The examination report for the Edinburgh LDP(REF) also concluded that the site had poor public transport access and connections to the existing built up area. This would limit its future development. **No modification proposed.**

#### Hargreaves Services

Westfield Surface Mine is included as part of site LWD 009 Westfield Green Business Park in the Fife Proposed Local Development Plan, 2015 (REF) and supported in the subsequent Examination Report (REF). However, it is not considered that it warrants inclusion in the specific significant business clusters within the Proposed Plan. It is a standalone site and it is not the purpose of the Plan to identify all individual employment sites, only those, which when brought together, form a regionally significant grouping. Identification of standalone major employment sites is the role of each Local Development Plan. **No modification proposed.**

#### Neart na Gaoithe Offshore Wind Ltd

Table 4.1 refers to 'an Area of Coordinated Action' as per page 39 in NPF3. This includes a range of uses for energy and port use "or other uses associated with an Area of Coordinated Action." Whilst Table 4.1 does not specifically reference cables and substations for major offshore wind farm developments it is considered that the references to the Area of Coordinated Action and low carbon energy generation give clear, if not literal, support for such operations. **No modification proposed.**

#### Queen Margaret University

Table 4.1 states that land adjacent to Queen Margaret University "*also provides opportunities for start-ups, with a focus on life sciences, research and learning and food and drink.*" It does not reference Edinburgh Innovation Park and Commercial Hub specifically; however it is considered specific site references are a matter to be addressed through Local Development Plans. **No modification proposed.**

#### Scottish Power Generation

Cockenzie and Longannet are included within the Forth Coast Cluster reflecting NPF3 (pages 14, 29, 33, 37, 39, 63 and 72). In the recent FIFEplan LDP examination report (REF) the restriction on low carbon energy related uses on the former Kincardine Power Station site was removed, reclassifying it as a general employment site. Whilst there is flexibility in uses within the clusters, it is not considered relevant to include this general employment site in the Forth Coast Cluster. Further to this the Forth Energy Corridor does not extend to the Kincardine Power Station site. **No modification proposed.**

#### Scottish Property Federation

SESplan recognise the importance of suitable office space in economic development. Office space is supported in the Central Business Cluster, which includes the city centre and north Edinburgh, and the West Edinburgh cluster. Other clusters also have the flexibility to provide office accommodation where appropriate. The Strategic Centres (page 49) are also included as locations where office development should be supported. However, specifying the type or category of office space is considered a more detailed matter which is better placed to be addressed in Local Development Plans. **No modification proposed.**

#### Mr Charles Strang

It is considered that the high quality environment of the Borders is referenced in the Assets pages 4 -5. **No modification proposed.**

## **Supporting Infrastructure and Housing**

Mr George Adam, Cockburn Association, Haddington and District Amenity Society, Liberton and District Community Council, Linlithgow & Linlithgow Bridge Community Council, Mrs Mirabelle Maslin, New Ingliston Ltd, Prestonpans Community Council, Roslin and Bilston Community Council, Scarborough Muir Group Limited, Shawfair LLP, Taylor Wimpey/Hallam Land, The Crown Estate, The National Trust for Scotland

It is considered that within the Proposed Plan the significant business clusters and the Spatial Strategy are aligned with areas of strategic growth. This is demonstrated in the Key Areas of Change pages 19-27 and ensures the clusters are supported by infrastructure such as public transport and housing and also allows the impacts on existing infrastructure and housing to be considered.

The majority of the sites listed within significant business clusters either already have an established and functioning employment use or are a brownfield site previously used for employment purposes. This means that for many of the sites there is some form of transport infrastructure in place. Further to this, in reference to the significant business clusters, paragraph 4.5 of the Proposed Plan directs Local Development Plans to “safeguard their future expansion by identifying and safeguarding sufficient land and supporting infrastructure...” **No modification proposed.**

Mr George Adam, Linlithgow & Linlithgow Bridge Community Council  
Junction 3 of the M9 is referred to in Table 6.1, Figure 6.2 and the Action Programme. **No modification proposed.**

Roslin and Bilston Community Council  
Transport infrastructure is dealt with under Issue 14. **No modification proposed.**

## **Placemaking and Environment**

Cockburn Association, Roslin and Bilston Community Council, RSPB Scotland, Scottish Wildlife Trust, Mr Charles Strang,

The Placemaking Principles within the Proposed Plan (paragraphs 3.5-3.6 and table 3.1) are to be taken account of through Local Development Plans and associated masterplans, design briefs and development frameworks. These principles will therefor apply to any new development associated with Significant Business Clusters. **No modification proposed.**

## **Strategic Centres**

Scottish Government

Paragraph 4.7 of the Proposed Plan advises that the strategic centres identified in Place for Communities section are also key areas for investment and economic development. If the reporter is so minded, to more closely reflect NPF3 pages 12 and 14 the role of the strategic centres could be given more prominence in the opening paragraphs 4.2-4.2 of the Locations for Investment section of the proposed plan. **No modifications proposed.**

## **Financial Services and Tourism**

Scottish Government

Inclusion of text that Edinburgh is “one of Europe’s most important sites for financial services and tourism” effectively repeats NPF3 page 12 paragraph 2. It is

considered that the Proposed Plan does recognise Edinburgh as one of Europe's most important sites for financial services and tourism, using this phrase in table 4.1 in the Central Business Cluster text. **No modifications proposed.**

### **Changes in Working Environments**

Cramond & Barnton Community Council, Edinburgh Association of Community Councils, Scottish Government

It is acknowledged that changes in the way people work such as flexible hours, remote, agile and home working and live work units can have an impact on the need for people to travel with environmental and quality of life benefits. Paragraph 95 of SPP (REF) supports this, directing plans to encourage opportunities for home-working, live-work units, micro-businesses and community hubs.

SESplan considers that this is a detailed policy matter and can be more appropriately addressed by Local Development Plan policies. Inclusion of text in the SDP directing Local Development Plan's to encourage such opportunities would merely be a repetition of SPP. SESplan does not consider that the function of an SDP is to repeat national policy. **No modification proposed.**

### **Environmental Innovations in Business Environments**

Scottish Government

SESplan does not consider it necessary to add additional text in relation to paragraph 96 of SPP in order to direct LDPs to support opportunities for the integration of efficient energy and waste innovations within business environments. To do so would be a repetition of SPP without adding any additional value. SESplan does not consider that the function of an SDP is to repeat national policy. This is a detailed policy matter and can be more appropriately addressed by Local Development Plan policies. **No modification proposed.**

### **Employment Land Supply**

Shepherd Offshore (Scotland) Ltd

Paragraph 4.13 in the Proposed Plan to identify and safeguard sufficient employment land. Whilst it does not state that Local Authorities must ensure land supply records are up to date this is a requirement of SPP paragraph 102 and does not require repetition in SDPs. **No modification proposed.**

### **Employment Land and Sites**

Edinburgh Association of Community Councils, Grange and Prestonfield Community Council, Liberton and District Community Council, New Ingliston Ltd, North Berwick Community Council, Scarborough Muir Group Limited, Scottish Government, Mr Julian Siann

It is recognised that to enable the region to respond to changing economic needs it is important that Local Development Plans are able to be flexible in relation to employment sites. This flexibility can mean in some circumstances an employment site is recategorised for other uses, including mixed-uses. As supported through paragraph 103 in SPP and paragraph 4.15 of the Proposed Plan.

Scottish Government

It is considered that the proposed additional wording is not required as it would effectively be a repetition of what is included in Proposed Plan paragraph 4.15. **No modification proposed.**

## **Tourism**

Liberton and District Community Council, Roslin and Bilston Community Council, Wallace Land Investment & Management

The Proposed Plan does not include a specific section on tourism, however it is considered to be referenced throughout the plan, acknowledging the region's unique assets and their economic value. This includes the SESplan Assets listed on pages 4 and 5, the Spatial Strategy, the Placemaking Principles in table 3.1, the Significant Business Clusters in table 4.1, paragraph 4.8-4.10 on rural economy, paragraphs 5.14 -5.16 on town centres and the Strategic Walking and Cycling routes in figure 6.1. **No modification proposed.**

## VisitScotland

Opportunities for growth around tourism and Leith facilitated by a tram extension are referenced in table 4.1 under the Central Business Cluster. **No modification proposed.**

## **Rural and Small Businesses**

Kelso Community Council, Lammermuir Community Council, Peebles Community Trust

Paragraphs 4.8-4.12 in the Proposed Plan set out SESplan's approach to the rural economy. This section includes promotion of smaller businesses and clusters. Beyond this detail on smaller business should be considered in Local Development Plans. **No modification proposed.**

## **Offshore Wind**

Neart na Gaoithe Offshore Wind Ltd, Scottish Natural Heritage

The significant business clusters reference port uses as part of the Forth Cost Cluster which may be suitable for servicing renewable energy. **No modification proposed.**

## **Other**

Liberton and District Community Council,

Paragraph 4.14 clearly references access to employment sites by public transport. It is outwith the remit of the SDP to compel public transport providers to increase services, however, the Proposed Plan's spatial strategy promotes development in a sustainable manner. **No modification proposed.**

## Mrs Mirabelle Maslin

Delivery of the Proposed Plan is set out in the SDP Action Programme. It is a requirement that Local Development Plans follow the content of the SDP. **No modification proposed.**

## Wallace Land Investment & Management

The City Region Deal is referenced in paragraphs 2.3 and 2.4 at the start of the Proposed Plan. This states that as the negotiations on the city region deal are continuing its impact on the plan is too early to predict. SESplan is required to submit the Proposed Plan within 4 years of SDP1 approval under planning legislation and therefore cannot delay preparation and submission of the Plan. It should also be noted that the City region Deal could be considered as a means to implementing the

SDP rather than a means of influencing the SDP. **No modification proposed.**

24 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.]

<b>Issue 4.2</b>	<b>Rural Economy</b>			
<b>Development Plan reference:</b>	<b>A Place to do Business – Rural Economy, page 34, para 4.8 – 4.12.</b>	<b>Reporter: [Note: For DPEA use only.]</b>		
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>				
<table border="1"> <tr> <td> 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) </td> <td> Near 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) </td> </tr> </table>			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)	Near 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)
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<b>Provision of the Development Plan to which the issue relates:</b>	A place to do business and the rural economy.			
<b>Planning Authority's summary of the representation(s):</b>				
<p><u>Borders Network of Conservation Groups</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 (REF 2012 Economic Value of Landscape in the Scottish Borders). Quality of landscape is 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</u>  Plan does not include reference to harbours and coastline which are important for the economy, quality of life and tourism. The regions 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

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

EDF Energy Renewables Ltd

No reference to role of onshore wind development in rural economy in line with recent planning decisions (REF) 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

Include facilitation of Eyemouth Harbour for renewables industry.

Gullane Area Community Council

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

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

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.

Near na Gaoithe Offshore Wind Ltd

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

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

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

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

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

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

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

SP Energy Networks

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

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

Mr Charles Strang

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

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

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

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

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

EDF Energy Renewables Ltd

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

Eyemouth Harbour Trust

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

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

Haddington and District Amenity Society

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

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

A new paragraph 4.13 should be added stating '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

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

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

Penicuik Estate/Penicuik House Preservation Trust

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 limited on-site new build. Off-site development, should be allowed, where the circumstances require this and where land is available.'

RSPB Scotland

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

Amend paragraph 4.8 to add '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 (REF) to cover all of region.

Scottish Wildlife Trust

No modification specified, indicated more on the role of ecosystems in rural economy.

SP Energy Networks

A new paragraph 4.13 should be added stating '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.'

SSE Renewables Ltd

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

Mr Charles Strang

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

#### Wemyss Estate Trustees

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, Minto Hills Conservation Group

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

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 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

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

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

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

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, Peebles Community Trust

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

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

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 development from taking place elsewhere. **No modification proposed.**

Disagree with modification in relation to extending the Fife Harbours Study (REF) 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, Wemyss Estate Trustees

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) also contains clear guidance on this matter. **No modification proposed.**

### **Energy, Renewables and Infrastructure**

EDF Energy Renewables Ltd, SSE Renewables Ltd

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, North Berwick Community Council, Mr Charles Strang

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, SP Energy Networks

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

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

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

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 (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:**

[Note: For DPEA use only.]

<b>Issue 5</b>	<b>Responsible Resource Extraction</b>	
<b>Development Plan reference:</b>	Page 36, paragraphs 4.16 – 4.21	<b>Reporter:</b> [Note: For DPEA use only.]
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Coal Authority (790141) Cockburn Association (037249) Eskbank and Newbattle Community Council (891202) Hargreaves Services (038881) Kelso Community Council (039365) Midlothian Green Party (778339) Moorfoot Community Council (906008) Roslin and Bilston Community Council (790524) RSPB Scotland (031480) Scottish Government (034404) Scottish Wildlife Trust (038549) Taylor Wimpey (930050)		
<b>Provision of the Development Plan to which the issue relates:</b>	Construction aggregates and energy minerals in the region.	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Coal Authority</u>  Proposed Plan mineral content on mineral safeguarding, areas of search for coal and hydrocarbon extraction are matters for Local Development Plans (LDPs) as set out in paragraphs 237 and 239-241 of SPP.</p> <p><u>Cockburn Association</u>  Generally support. Welcome restoration and regeneration of former mining sites. Opportunities for forestry and /or return to agriculture should be considered. Question roles and costs in regeneration of sites for housing.</p> <p>Plan should indicate areas where unconventional oil and gas extraction not allowed.</p> <p><u>Eskbank &amp; Newbattle Community Council</u>  Recognise and support need for 10 year reserve of construction aggregates but consider mitigating disruption to communities is important.</p> <p><u>Hargreaves Services</u>  Plan should reiterate Scottish Planning Policy (SPP) paragraph 239 requiring LDPs to identify areas of search for surface coal mining. Plan should recognise coal is not solely used in energy generation and reaffirm importance of coal in economy and need for LDPs to identify areas of search. Plan should recognise contribution</p>		

coal extraction makes to Scotland's economy and make provision for surface coal mining sites should the need arise.

Plan should designate legacy and restored sites as priority sites for development to further enable restoration and maximise benefits from these sites.

#### Kelso Community Council

Unconventional oil and gas policy follows Scottish Government policy, but this means unconventionally extracted oil and gas is imported from the US.

#### Midlothian Green Party

Contradiction between identifying coal, oil and gas reserves and low carbon economy. Fossil fuel extraction cannot support a low carbon city region. No fossil fuel power stations mean that energy minerals cannot be used close to where they are extracted. Direction to LDPs to identify coal, oil and gas reserves, as opposed to areas of search, is a change since Main Issues Report. Plan should support policies for ensuring that fossil fuels are left in the ground.

#### Moorfoot Community Council

The requirement for LDPs to identify coal, oil and gas reserves is incompatible with strategy. This is also a change since the Main Issues Report. SPP states Local Authorities 'should' identify reserves. Plan should indicate areas not supported for the extraction of onshore gas. LDPs now having to identify reserves means there will be no direction as to where developments should or should not go.

#### Roslin and Bilston Community Council

Restoration should be considered in the extraction of minerals.

Minerals sites can cause pressure on unsuitable roads.

#### RSPB Scotland

Welcome text on restoration of former mining sites, could be extended to landfill, onshore wind and unconventional gas extraction. Plan should encourage Local Authorities to undertake compliance monitoring on opencast coal, quarries, landfill, onshore windfarms and electrical interconnector transmission lines and provision of financial guarantees to avoid liabilities passing to Local Authorities.

Reference could be made for any new areas of resource extraction to avoid impacts on deep peat. Reference could be made to protecting peatland habitats in carbon and biodiversity value in accordance with Scotland's National Peatland Plan (REF) and SPP. Plan should identify opportunities for peatland restoration.

Welcome minerals working group and would be happy to contribute.

Unconventional gas extraction has environmental impacts. Extraction of fossil fuels is unnecessary given the potential for renewable energy in Scotland.

Quarry at Oxwell Mains, Dunbar should have a site restoration programme to create habitat for wildlife rather than agriculture.

Scottish Government

It is not clear what the status of the output of the Minerals Working Group would be.

Scottish Wildlife Trust

Environmental liability and compensation must be established.

Plan should state it opposes peat extraction for horticulture.

TaylorWimpey

Welcome statement on LDPs to identify former mining sites and means of restoration, in relation to Blindwells former mining site.

**Modifications sought by those submitting representations:**

Cockburn Association

Add support for forestry and agriculture regeneration of former mining sites. Add details on role and costs in regeneration of former sites for housing.

Plan should indicate areas where unconventional oil and gas extraction not allowed.

Hargreaves Services

Plan should reiterate SPP requiring LDPs to identify areas of search for surface coal mining. Plan should recognise contribution coal extraction makes to Scotland's economy and make provision for surface coal mining sites should the need arise. Plan should designate legacy and restored sites as priority sites for development to further enable restoration and maximise benefits from these sites.

Midlothian Green Party

The Plan should not identify fossil fuel reserves. Plan should support policies for ensuring that fossil fuels are left in the ground.

Moorfoot Community Council

The requirement for LDPs to identify coal oil and gas reserves should be removed. There should be no provisions in the Plan that facilitate unconventional oil and gas developments.

RSPB Scotland

Plan should set out the need for Planning Authorities to include a requirement for financial guarantees to cover all potential restoration, aftercare, decommissioning and mitigation costs of all major infrastructure developments, as well as compliance monitoring for all development. Recommend that SESplan provides further guidance on this issue. Section should make specific reference to avoiding impacts on deep peat.

4.20 Would welcome reference to the need for LDPs to take a precautionary approach towards unconventional gas extraction, with the inclusion of policies that set a presumption against unconventional gas extraction.

4.21 Suggest 'to maximise benefits for communities and wildlife' is added at the end of this paragraph. i.e. 'identify former mineral sites and the potential means of restoration and regeneration in accordance with the vision and spatial strategy of the Strategic Development Plan to maximise benefits for communities and wildlife.

#### Scottish Government

Support working group for minerals, but there should be a clear statement of intent as to what the status of the findings or output of the working group will be. This is to avoid these key strategic matters being without direction for the plan period. Although not preferred, it would be appropriate to include a statement that the output of the working group will be adopted as supplementary guidance as well as listing the elements that the development plan authority considers should be contained therein.

#### Scottish Wildlife Trust

Environmental liability and compensation must be established. Plan should state it opposes peat extraction for horticulture.

### **Summary of responses (including reasons) by Planning Authority:**

#### **Construction Aggregates**

##### Scottish Government

Paragraph 236 of SPP (REF) requires Strategic Development Plans to ensure that adequate supplies of construction aggregates can be made available from within the region to meet the likely development needs over the plan period. Following the publication of the 2012 Scottish Aggregates Survey in 2015 (REF) it is indicated that the region's supply of sand and gravel is 32 years and the supply of Hard Rock is 15 years. At the time of preparing the SESplan Minerals Technical Note, 2015 data from this survey was not available however, the landbank of reserves was indicated to be a similar position i.e. exceeding 10 years supply. This technical note has now been updated to more accurately reflect the current position and indicates that the supply remains in excess of 10 years. The updated Minerals Technical Note has been submitted as supporting document (REF).

SESplan does not accept the modification that the output of the Minerals Working Group should be adopted as Supplementary Guidance. The aim of Minerals Working Group indicated in the Proposed Plan is to continue to monitor the region's supply of construction aggregates over the plan period. As it is indicated that the supply of construction aggregates is in excess of 10 years and is unlikely to require any substantial corrective action in strategic policy terms.

It is however accepted that the region's position on construction aggregates could be made clearer. If the Reporter is so minded, reference could be made within the text confirming there is a sufficient supply of construction aggregates available to meet the anticipated construction needs in the city region over the SDP period and clarifying the working group's function is to monitor and review the aggregate resources of the city region. **No modifications proposed.**

#### **Coal, Oil and Gas Reserves**

Coal Authority, Hargreaves Services, Midlothian Green Party, Moorfoot Community

## Council

Paragraph 4.20, line 1 of the Proposed Plan states that “Local Development Plans will identify coal, oil and gas reserves to support a diverse energy mix, giving sufficient weight to the avoidance of long term environmental impacts and greenhouse gas emissions from their use.” This statement, in part, refers to SPP paragraphs 237 and 239-241.

There is no requirement for Strategic Development Plans to repeat national policy, however, if the Reporter is so minded, amending the text in paragraph 4.20, line 1 may improve consistency and clarify and confirm that this paragraph refers to LDPs identifying energy mineral areas of search. **No modification proposed.**

## Hargreaves Services

Whilst the importance coal may play in the economy of the country is noted, it is not considered that it would be appropriate for the Strategic Development Plan to make provision for surface coal mining. This information would be more applicable to LDPs and Development Management decisions. **No modification proposed.**

## **Unconventional Oil and Gas Extraction**

### Cockburn Association, Kelso Community Council, RSPB Scotland

Scottish Government announced a moratorium on unconventional oil and gas in January 2015 and direction was issued to Planning Authorities in October 2015. This was to enable further research to be undertaken by the government. Whilst research has now been published, the process is ongoing and the moratorium remains in place with no further direction given to Planning Authorities. As a result, SESplan does not consider it appropriate to offer direction on unconventional oil and gas matters in the Proposed Plan. **No modification proposed.**

## **Protection of Community, Environment and Site Restoration**

### Cockburn Association, Eskbank & Newbattle Community Council, Hargreaves Services, Roslin and Bilston Community Council, RSPB Scotland, Scottish Wildlife Trust, TaylorWimpey

The Proposed Plan includes direction to LDPs to identify former minerals sites and potential means of restoration and regeneration in accordance with the vision and spatial strategy of the Proposed Plan. The Proposed Plan does not set out or prioritise specific sites or what form of restoration or regeneration would be most appropriate as this will vary between different sites, locations and the needs of each area. Examples are given in the supporting text of regeneration schemes for housing or employment, however, this is not intended to preclude restoration or regeneration for other uses. These examples are used as they are most relevant at a strategic planning scale. Details of compliance, funding mechanisms and liability will also be site specific, dependant on the type of works and site ownership. It is considered that detailed information on the monitoring, restoration and regeneration of former minerals sites is most appropriately dealt with through LDPs. **No modification proposed.**

## RSPB Scotland

It is noted that the inclusion of other decommissioned sites including other mining works, landfill, onshore wind and unconventional gas extraction may also benefit from guidance on restoration, however it is considered these types of sites are

potentially less likely to constitute development at a strategic scale at this time and such restoration and regeneration can be dealt with through LDPs. **No modification proposed.**

Eskbank & Newbattle Community Council, Roslin and Bilston Community Council

It is acknowledged that minerals extraction development may impact on communities and road infrastructure, however as the Proposed Plan does not identify specific sites, the impacts of minerals extraction and any require mitigation are best dealt with by the individual local planning authorities. **No modification proposed.**

**Peat**

RSPB Scotland, Scottish Wildlife Trust

SPP paragraph 241 states that areas of peatland should be protected and commercial extraction should only be permitted in very limited areas. Paragraph 205 provides direction to Development Management in terms of peat and development disturbance. It is not considered that the Strategic Development Plan can add further policy advice at the strategic plan scale. **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:**

[Note: For DPEA use only.]

<b>Issue 6</b>	<b>Zero Waste</b>	
<b>Development Plan reference:</b>	Page 37 paragraphs 4.22 and 4.23.	<b>Reporter:</b> [Note: For DPEA use only.]
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Dunbar Community Council (790195) Hargreaves Services (038881) Liberton and District Community Council (790396) Scottish Environmental Protection Agency (790577) Scottish Government (034404)		
<b>Provision of the Development Plan to which the issue relates:</b>	Section of the plan dealing with the approach to waste.	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Dunbar Community Council</u>  Concerned energy from waste plant at Oxwellmains will result in traffic issues. No indication of heat plan required by application.</p> <p><u>Hargreaves Services</u>  Plan should support developments which address local waste in a sustainable way, particularly where a site can manage the full process and make use of heat from other industries. Legacy surface mining sites have a variety of benefits making them suitable sites for waste management facilities. Westfield Surface mine should be identified as a key development opportunity for waste management facilities.</p> <p><u>Liberton and District Community Council</u>  Support paragraph 4.25. Should be cross-referenced to paragraph 4.23 re energy from waste facilities.</p> <p><u>Scottish Environment Protection Agency</u>  Support zero waste approach but Plan does not identify or safeguard strategic waste management facilities as required by Scottish Planning Policy (SPP). This is to reduce the possibility of in-appropriate co-location of new developments.</p> <p><u>Scottish Government</u>  SPP paragraph 185 requires strategic development plans to set out spatial strategies which make provision for new waste infrastructure, indicating clearly that it can generally be accommodated on land designated for employment, industrial or storage and distribution uses. It is not clear what waste needs are in the area and how they would be accommodated.</p>		

**Modifications sought by those submitting representations:**

Hargreaves Services

Plan should support developments which address local waste in a sustainable way. Westfield Surface mine should be identified as a key development opportunity for waste management facilities.

Liberton and District Community Council

Should be cross-referenced to paragraph 4.23 re energy from waste facilities.

Scottish Environment Protection Agency

Plan should identify by name and/or by map the strategic waste management facilities in the area.

Scottish Government

Set out provision for new waste infrastructure. Indicate waste needs and how these can be accommodated.

**Summary of responses (including reasons) by Planning Authority:**

Scottish Government

SESplan's Waste Technical Note, 2015 paragraph 3.1 confirms that the SESplan region has a landfill capacity in excess of 21.5 million tonnes of waste. This is compared to the latest (2013) figures from the Zero Waste Plan Annex B (REF) which shows that the region requires a ten year rolling landfill capacity of 4.7 million tonnes. It is made clear that the region has capacity to meet its landfill targets and as a result the technical note sets out that it is anticipated that new waste infrastructure will not be required over the plan period.

Paragraph 4.23 of the Proposed Plan reflects this stating that "The current landfill capacity in the city region is in excess of the requirements set out by the Scottish Government." It is accepted however that this statement could be clearer, give a greater indication of waste needs and how these are being met and more accurately reflect paragraph 185 of SPP with regards to new waste infrastructure.

If the Reporter is so minded, additional text could be added to confirm that over the plan period the city region is indicated to have significant landfill capacity in excess of these requirements and as a result new landfill waste infrastructure is not anticipated to be required in the Plan period. **No modification proposed.**

Dunbar Community Council

The specific details of the Oxwellmains site are a matter of consideration through East Lothian Council.

**No modification proposed.**

Hargreaves Services

Whilst SESplan recognise that it is important for developments to address local waste in a sustainable way, this level of detail is outwith the scope of the SDP. The Proposed Plan does not identify individual waste management facilities. **No**

**modification proposed.**

Liberton and District Community Council

It is agreed that recovery of heat from waste could be cross-referenced in the plan. This is addressed under Issue 7: Low Carbon. **No modification proposed.**

Scottish Environment Protection Agency

Strategic waste facilities are detailed in the SESplan Waste Technical Note, 2015. It is not considered that mapping existing facilities would add value to the Proposed Plan as sites are protected for inappropriate development through Local Development Plans and Development Management rather than the SDP. SESplan consider the Proposed Plan approach is consistent Scotland's Zero Waste Plan (REF). **No modification proposed.**

7 representations supporting this section of the Proposed Plan are noted.

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]

<b>Issue 7</b>	<b>A Low Carbon Economy</b>	
<b>Development Plan reference:</b>	<b>Page 38-39</b> Paragraphs 4.24 – 4.29 and Figure 4.2	<b>Reporter:</b> [Note: For DPEA use only.]
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Borders Network of Conservation Groups (039614)  Cockburn Association (037249)  Cramond and Barnton Community Council (803443)  Denholm and District Community Council (040612)  EDF Energy (040462)  EDF Energy Renewables Limited (039326)  Edinburgh Association of Community Councils (040476)  Edinburgh BioQuarter Partners (037370)  Fred. Olsen Renewables Limited (831830)  Gullane Area Community Council (037068)  Hargreaves Services (038881)  Lammermuir Community Council (039856)  Liberton and District Community Council (790396)</p>	<p>Mrs Mirabelle Maslin (928549)  Midlothian Green Party (778339)  Minto Hills Conservation Group (040607)  Moorfoot Community Council (906008)  Near na Gaoithe Offshore Wind Limited (034699)  North Berwick Community Council (035522)  Northumberland County Council (790480)  Renewable Energy Systems Ltd. (RES) (038582)  Roslin and Bilston Community Council (790524)  RSPB Scotland (031480)  Scottish Power Generation (034698)  Scottish Government (034404)  SP Energy Networks (034701)  SSE Renewables Limited (040624)  Mr Charles Strang (907037)</p>	
<b>Provision of the Development Plan to which the issue relates:</b>	This section of the plan deals with low carbon energy including wind and heat.	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Borders Network of Conservation Groups</u>  2km separation distance does not cover homes outwith settlements. 2km should be a minimum from any dwelling.</p> <p>Repowering of turbines are likely to be taller than existing turbines requiring larger separation distances and new concrete bases. Repowering will further destruct habitats, peat and water courses, will require new access tracks and visual impacts will be increased. Existing turbines are micro-sited to minimise impacts concerned that repowered turbines may not be.</p>		

Cockburn Association

Generally support approach, but concerned about balance of wind farms and impact on environment and communities.

Cramond & Barnton Community Council

Focus policy more on small scale, diverse and environmentally acceptable renewable energy schemes including community wind turbines, solar, hydro and biomass.

Denholm and District Community Council

Objects to promotion of Borders for further wind development.

EDF Energy

Plan could more positively and accurately reflect national energy and policy position.

'2km separation zone' is a term not used in Scottish Planning Policy (SPP) or guidance. It should be made clear in the plan that 2km separation is not a ban on wind development but are areas for consideration of visual impact.

EDF Energy Renewables Ltd

Paragraph 4.27 is negative in saying wind developments in East Lothian and Borders have already made a significant contribution to low carbon economy, when the Scottish Government have indicated renewable energy and electricity targets for 2020 and 2030 face significant shortfalls and carbon emission savings targets for 2020, 2030 and 2050 remain challenging.

Paragraphs content on significant peatland habitats also negative and '2km separation zone' is a term not used in SPP or guidance. It should be made clear in the plan that 2km separation is not a ban on wind development but are areas for consideration of visual impact.

EDF Energy, EDF Energy Renewables Ltd

Paragraph 4.28 exploring wind farm repowering is supported, however emphasis seems to be on minimising impacts on cross boundary assets in plan, not on opportunities. Repowering should be seen as an opportunity to meet challenging renewables and electricity targets and to address climate change.

Mention should be given to wind farm extensions as per SPP paragraph 161.

Edinburgh Association of Community Councils

Low carbon economy should apply to existing settlements.

Edinburgh BioQuarter Partners

Plan should recognise alternative heating sources including district heating which is being promoted at the BioQuarter along with a longer term energy from waste facility.

Fred. Olsen Renewables Ltd

Figure 4.2 Areas with Potential for Wind Farm Development it is not appropriate to

caveat only this area with 'subject to landscape capacity and other assessment'. Object to caveating for landscape capacity. Landscape and Visual Impact Assessment (LVIA) should be used to assess this on a case by case basis. It should not be predetermined by strategic guidance. 2km upper limit separation zone should also be assessed on a case by case basis. These should be clear in the plan.

Support cross boundary wind farm working group .

In the transition to a low carbon strategy the Plan should recognise new and repowering of onshore wind development will continue to have a role.

Exploring increased production from existing wind farms and exploring energy storage and complimentary sources of generation should also be included. Policy in the Strategic Development Plan and Local Development Plans should be flexible and supportive of low carbon technologies. Onshore wind development should be subject to the same assessment and consideration as other energy development and be considered on a case by case basis. Lammermuir Hills and similar are Group 3 areas in SPP and do not need to be highlighted as strategic constraints.

#### Gullane Area Community Council

Table 4.2. This shows shaded in grey areas which should be given significant protection from windfarm development. Figure 4.2 should include Garleton Hills in areas with significant protection from wind farm development.

#### Hargreaves Services

Believe implementing a 2km buffer zone around settlements will be overly and unnecessarily restrictive. Any potential impacts on settlements should be assessed as part of an Environmental Impact Assessment.

Should incorporate policy on energy storage, and any policy should be supportive of renewable energy developments that incorporate an aspect of energy storage

#### Lammermuir Community Council

New sites for onshore wind should be put on hold until there has been an assessment about the need for more generation nationally and in the region. Grid capacity should be assessed. Should not be an assumption that existing sites are best for repowering, some function poorly and should be decommissioned.

Areas affected by substantial adverse landscape change, including the Lammermuirs, should be protected from further development.

#### Liberton and District Community Council

Support proposals as set out in paragraph 4.25. Should be cross referenced to paragraph 4.23 re energy from waste facilities.

#### Mrs Mirabelle Maslin

How can plan ensure co locations of heat demand and supply and that all opportunities are identified.

Midlothian Green Party

There should be a region-wide low carbon plan, addressing energy, heat and transport. 2km buffer on wind development is too restrictive.

Minto Hills Conservation Group

Paragraph 4.27 ambiguous. Repowering will lead to larger turbines and should refer to buffer zones and acknowledgement should be made to increased environmental damage.

Moorfoot Community Council

Support cross boundary wind farm working group but consider there should be similar for other renewable energy proposals. A region wide sustainable energy plan which looks at resources and constrains in each authority and sets targets and actions should be produced.

Neart na Gaoithe Offshore Wind Ltd

Plan fails to consider a wider range of developments needed for low carbon economy. Plan fails to fully address National Planning Framework (NPF) as there is no reference to providing infrastructure for major offshore renewable energy developments and no mention of the National Development number 4 'An Enhanced High Voltage Energy Transmission Network'.

Should recognise the role of role of East Lothian as landfall for nationally significant offshore wind developments.

North Berwick Community Council

Low carbon economy means that there should be no large scale development in North Berwick as it is not sustainable. Would support moves to compel developers to adopt new technologies and alternative energy sources.

Northumberland County Council

Northumberland County Council welcomes the establishment of this working group and would wish to be involved in this group given there is potential for cross boundary effects with Northumberland. Would be beneficial to set out a policy framework for other renewable energy technologies not just wind.

Renewable Energy Systems (RES)

Paragraph 4.27 reflects paragraph 163 of SPP. Support Cross Boundary Wind Farm Working Group but consider there should be industry representation.

Should acknowledge increasing energy storage opportunities.

Roslin and Bilston Community Council

Should suggest how low carbon policy can be implemented. Low carbon economy should first be achieved by building houses close to centres of employment or locating businesses in rural areas with targeted public transport and high speed broadband access. Current plans for out of town dormitories and transport corridors will not achieve low carbon economy.

Support development located to sources of heat supply but this may not always be

possible.

Plan should ask developers to include technology such as solar panels and be built heat efficient homes and use roof of large buildings such as schools for solar panels.

#### RSPB Scotland

Plan needs to recognise the need for low carbon developments to be sustainable and not have a negative impact on wildlife. Impacts on Firth of Forth Special Protection Area must be considered regarding development of former Cockenzie and Longannet power stations. Support continued development of onshore wind farms where this does not harm natural environment. Would like to see cumulative ornithological impacts considered from wind developments to ensure compliance with Strategic Environmental Assessment and Appropriate Assessment requirements, as well as local authorities biodiversity duties under the Nature Conservation Scotland Act 2004 in the context of natural heritage zones. Approach used in 2050 RSPB Energy Vision (REF).

Commend the recognition of opportunities for providing low-carbon power and heat solutions and an integrated transport network. Future development at Cockenzie should take into account the Musselburgh Lagoons and take opportunity to incorporate new habitat.

#### Scottish Power Generation

Proposed plan does not make sufficient reference to National Planning Framework policy including in reference to former Longannet Power Station site. National Planning Framework National Developments at Longannet and Cockenzie, despite their status changing, must be taken account of in the Plan. Should also make reference to wider aspirations for Cockenzie in National Planning Framework and taskforce masterplan for Longannet.

#### Scottish Government

Strategic Development Plans should support national priorities for strategic energy infrastructure including generation, storage, transmission and distribution networks.

Plan should address cross boundary issues, promoting an approach to electricity and heat that supports the transition to a low carbon economy.

Consider that Strategic Development Plan Authorities should encourage the efficient delivery of heat in all its forms, looking for potential opportunities to link urban networks across broader metropolitan areas, including local authority boundaries. There is no apparent consideration given in the Plan (including background reports) to cross boundary heat issues and no action proposed to consider this. Should use Scotland's Heat Map.

#### SP Energy Networks

Does not consider wider range of developments which contribute to the delivery of a low carbon economy. Does not address National Planning Framework by failing to reference national electricity transmission network, grid connections for onshore renewables, National Development 4 (An Enhanced High Voltage Energy

Transmission Network). Does not address Energy Network Strategy Group (ENSG) Our Electricity Transmission Network: A Vision For 2020 document or the National Grid's Network Options Assessment.

Mr Charles Strang

Should reference river and 'lade-based' renewable energy generation. No area around Scottish Cheviots where wind farms are not acceptable this should be reconsidered along with impacts on Northumberland National Park.

SSE Renewables Ltd

Generally support but should recognise that the Scottish Government have indicated renewable energy and electricity targets for 2020 and 2030 and face significant shortfalls and carbon emission savings targets for 2020, 2030 and 2050 remain challenging. Recognise Scottish Borders and East Lothian can still provide opportunities for onshore wind. '2km separation zone' is a term not used in SPP or guidance it is referred to as area not exceeding 2km. The extent of the area will be determined by land form and other features which restrict views out from the settlement" (Table 1, SPP). 2km is a maximum and only refers to potential visual impact. Plan should require Local Authorities to justify maximum 2km distance.

Repowering should be seen as an opportunity to meet challenging renewables and electricity targets and to address climate change. Plan should set a positive policy framework for repowering for all constituent Planning Authorities to then progress at the Local Development Plan level.

Mention should be given to wind farm extensions as per SPP paragraph 161.

Considerable operational consented wind energy development in the region should be acknowledged as a resource with further potential and supported in policy terms.

**Modifications sought by those submitting representations:**

Borders Network of Conservation Groups

Add: 'Local Development Plans will apply separation zones of at least 2km from a wind farm to any dwelling. Local Development Plans should set out environmental, landscape and habitat considerations based on future re-powering with turbines of heights in excess of 150m, regardless of whether they will have cross-boundary effects.'

Cockburn Association

Paragraph 4.24 Include a statement to monitor improvements in vehicle emissions and its related opportunities for more flexible options to locate housing land.

Paragraph 4.27 add statements: "seek optimum energy capacity"; "Review the separation distance required for new, taller 'repowering' turbines"; "Where there is a conflict between the location of a windfarm and the natural heritage and community interests in the area, the provisions in the National Park (Scotland) Act 2000 9(6) should be applied."

Paragraph 4.29 add: “Local Development Plans should provide guidance for the development of windfarms: Informal turbine layouts that reflect natural landforms, rather than formal, geometric layouts; Variation in turbine size with elevation “larger at lower elevations, smaller at higher elevations, especially on skylines; Variation in colour of turbines “local vegetation colours against a landscape background; lighter, cloud colours against a sky background; Connecting powerlines to be sited to minimize their impacts; Road and fence alignments to be sinuous and reflect landforms, rather than geometric; All structures to be designed to minimise their impacts.”

Cramond & Barnton Community Council

Focus policy more on small scale, diverse and environmentally acceptable renewable energy schemes including community wind turbines, solar, hydro and biomass.

EDF Energy Renewables Ltd

Recognise challenging renewable energy, electricity and carbon targets. Scottish Borders and East Lothian still provide opportunities for onshore wind development. Supporting text to Onshore Wind Spatial Framework should be more positive.

EDF Energy Renewables Ltd, EDF Energy

Position on 2km separation zone should be clarified.

Repowering of wind farms should be seen as an opportunity. Should add text on potential for wind farm extensions. Amount of operational and consented wind energy development in the region should be considered a significant infrastructure resource and supported by the policy.

Edinburgh Association of Community Councils

Low carbon economy should apply to existing settlements.

Edinburgh BioQuarter Partners

Plan should recognise alternative heating sources including district heating and energy from waste. Bioquarter could be an exemplar.

Fred. Olsen Renewables Ltd

Add amend as follows: 4.27 Wind farm developments in the region, particularly in the Scottish Borders and in East Lothian have already made and will continue to make a major contribution to Scotland's transition to a low carbon economy. Repowering in particular provides a platform for maximising the generating capacity of existing sites and utilisation of grid connections. There are also significant areas of peatland habitat in the Scottish Borders important for carbon sequestration. Figure 4.2 sets out a spatial framework that identifies areas with potential for wind farm development, subject to landscape capacity and detailed considerations against relevant Local Development Plan policy criteria. Included in this framework is a 2km separation zone around settlements. Local Development Plans will apply these 2km separation zones up to a maximum of 2km from an identified settlement envelope or edge for creating spatial frameworks.

4.28 SESplan will establish a Cross-Boundary Wind Farm Working Group to explore the potential for a plan-led approach to identifying strategic capacity for wind farms and repowering opportunities (i.e. using existing infrastructure where possible and replacing old turbines with new ones , increasing tip heights and rotor diameters of existing turbines and potentially incorporating energy storage and other complimentary sources of generation) in areas where there are likely to be cross-boundary effects. Relevant member authorities, including the Energy Consents Unit and developers/industry representatives will pursue a collaborative plan-led approach to repowering in order to develop a low carbon economy and minimise the impact on key cross-boundary assets.

4.29 Local Development Plans will also set out the full range of additional considerations they will apply to wind farm energy development proposals based on the particular characteristics of each area and in line with SPP. In doing so, they should liaise closely with neighbouring authorities to identify and establish a consistent policy approach to key strategic cross-boundary assets. These assets will include, but will not be limited to, the Pentland Hills Regional Park, the Lomond Hills Regional Park, the Lammermuir Hills and the Firth of Forth.

#### Gullane Area Community Council

Figure 4.2 should include Garleton Hills in areas with significant protection from wind farm development.

#### Hargreaves Services

Remove 2km buffer zone and replace with assessment under Environmental Impact Assessment. Add text supporting energy storage.

#### Lammermuir Community Council

New sites for onshore wind should be put on hold until there has been an assessment about need. Grid capacity should be assessed. Should not be an assumption that existing sites are best for repowering. Areas affected by substantial adverse landscape change, including the Lammernuirs, should be protected from further development.

#### Liberton and District Community Council

Support proposals as set out in paragraph 4.25. Should be cross referenced to paragraph 4.23 re energy from waste facilities.

#### Mrs Mirabelle Maslin

No modification specified, more specific identification of opportunities and delivery actions implied.

#### Midlothian Green Party

There should be a region-wide low carbon plan, addressing energy, heat and transport. 2km buffer on wind development is too restrictive.

#### Minto Hills Conservation Group

Reword paragraph 4.27 'Local Development Plans will apply separation zones of at least 2km from all residential buildings (regardless of whether they are in a settlement envelope/edge or standalone) or insist that the developer provides

compensation to the owner/s.' Refer to buffer zones and increased environmental damage in repowering.

Moorfoot Community Council

Produce region wide sustainable energy plan. Give explicit support for community and council owned renewable energy.

Neart na Gaoithe Offshore Wind Ltd

Include clearer reference to NPF3, in particular national development 4. New paragraphs to be included in between existing paragraphs 4.26 and 4.27, as follows:

“4.27 The city region, in particular East Lothian, is key to the delivery of a number of major offshore renewables developments, including the Neart na Gaoithe Offshore Wind Farm. Planning permissions exist (and in cases such as Neart na Gaoithe have been implemented) for essential new terrestrial infrastructure including cables and substations relating to offshore renewables.

4.28 The city region accommodates a number of developments falling within the scope of NPF3's National Development number 4, including those relating to offshore wind farms such as Neart na Gaoithe. Member authorities should recognise the need for new large scale transmission infrastructure essential to the offshore renewables industry and more generally in contributing towards the delivery of a low carbon economy. LDP policies should promote such development and safeguard approved infrastructure against potentially conflicting development which might jeopardise its delivery.

4.29 Opportunities associated with offshore renewables exist at port and harbour locations across the city region, in particular in supporting the industry through construction, operation and maintenance phases of development. Member authorities will support ports and harbours potential involvement in the offshore renewables sectors by facilitating development essential to such roles. Subsequent paragraph numbers to be updated accordingly.

New figure to be included illustrating strategically important infrastructure contributing towards the delivery of a low carbon economy, including Neart na Gaoithe's terrestrial infrastructure.

North Berwick Community Council

No modification specified, assume no development at North Berwick and policy to ensure developers adopt new technologies.

Northumberland County Council

Set out a policy framework for other renewable energy technologies not just wind.

Renewable Energy Systems Ltd. (RES)

Support Cross Boundary Wind Farm Working Group but consider there should be industry representation. Paragraph 4.29 add 'The Scottish Government recognises the importance of the integration of energy storage as part of the energy mix. Local Development Plans shall include provision to support the deployment of energy

storage in locations throughout the region.'

#### Roslin and Bilston Community Council

Suggest how low carbon policy can be implemented. Start with more sustainable housing and employment strategy. Building less and more slowly. Ask developers to include technology such as solar panels and be built heat efficient homes and use roof of large buildings such as schools for solar panels.

#### RSPB Scotland

Figure 4.2 Onshore Wind Spatial Framework the legend should be updated to refer to further consideration of ecological risk. i.e. \*Subject to landscape capacity ecological risk and other assessment. Figure 4.2 The legend should make it clear that the 2km buffer around communities is a maximum, the actual size of the buffer area should be determined by the planning authority.

4.26 SESplan should promote the use of district heating and establishment of energy centres within all major redevelopment areas, not just at Longannet and Cockerzie.

Any references to biomass plants should note that feedstocks should only be from sustainable sources.

Would like to see cumulative ornithological impacts considered from wind developments in the context of natural heritage zones.

Include policies to ensure that any implementation of thermal generation at Cockerzie (or elsewhere) is compatible with Scotland's climate targets.

#### Scottish Power Generation

Modify the proposed plan as follows: Include clearer reference to NPF3, in particular: (i) national development number 3; (ii) commentary on potential aspirations for the Cockerzie site; and (iii) the Cockerzie to Torness Area of Coordinated Action;

Add after paragraph 4.26: "Although electricity generation at Cockerzie and Longannet has recently ceased, both sites are afforded national development designation for continued baseload generation by NPF3. Those designations remains extant and Local Development Plans should facilitate development consistent with the designations and any subsequent policy relating to the sites which might emerge from any NPF review during the SESplan period. NPF3 also recognises the potential of the former Cockerzie Power Station site for renewable energy and energy-related investment, whilst in considering the potential for conflicting uses, seeks to promote development which maximises the site's economic development potential. East Lothian Council should reflect these aspirations in its Local Development Plan."

Add to paragraph 4.26, after the sentence ending Carbon Capture and Storage Network (sentence 2) "A taskforce is currently developing a masterplan for the former Longannet Power Station site, with a focus on maximising employment opportunities, during and following the long-term demolition and decommissioning

process.”

Scottish Government

Amend to include a statement that the outputs of cross boundary working groups for wind and strategic heat infrastructure will be adopted as supplementary guidance listing the elements that should be contained within them.

SP Energy Networks

Add after paragraph 4.26: “4.27 Significant investment in the electricity grid across the city region will be delivered during the SESplan period. The city region accommodates a number of grid reinforcement developments falling within the scope of NPF3’s national development number 4, as well as upgrading and improvement works. Member authorities should recognise the need for essential electricity grid reinforcement, upgrading and improvement works that contribute towards the delivery of a low carbon economy, maintaining an ongoing dialogue with the grid operator in order to facilitate its programme of works over short-, medium- and long-terms. LDP policies should promote and facilitate such development and safeguard approved infrastructure against potentially conflicting development which might jeopardise its delivery.

Add new figure illustrating strategically important infrastructure contributing towards the delivery of a low carbon economy.

Mr Charles Strang

Should reference river and ‘lade-based’ renewable energy generation. No area around Scottish Cheviots where wind farms are not acceptable this should be reconsidered along with impacts on Northumberland National Park.

SSE Renewables Ltd

Recognise challenging renewable energy, electricity and carbon targets. Scottish Borders and East Lothian still provide opportunities onshore wind development. Supporting text to Onshore Wind Spatial Framework should be more positive.

Position on 2km separation zone should be clarified.

Repowering of wind farms should be seen as an opportunity. Should add text on potential for wind farm extensions. Amount of operational and consented wind energy development in the region should be considered a significant infrastructure resource and supported by the policy.

**Summary of responses (including reasons) by Planning Authority:**

**Onshore Wind Spatial Framework**

Borders Network of Conservation Groups, EDF Energy Renewables Ltd, EDF Energy, Fred. Olsen Renewables Ltd, Hargreaves Services, Midlothian Green Party, Minto Hills Conservation Group, RSPB Scotland, SSE Renewables Ltd  
Paragraph 161 of SPP states that the development plan should set out a spatial framework identifying areas that are most likely to be appropriate for onshore wind farms. This framework is to use Table 1 (page 39) of SPP which identifies three groupings of areas to guide onshore wind farm development. These include: Group

1 'Areas where wind farms not acceptable', Group 2 'Areas of Significant Protection' and Group 3 'Areas with potential for wind farm development. Group 2 'Areas of Significant Protection', includes provision for an area of 'community separation for consideration of visual impact'. This is described as "an area not exceeding 2km around cities towns and villages" with the extent of the area to be "determined by the planning authority based on landform and other features which restrict views out of the settlement".

In the Proposed Plan, figure 4.2 Onshore Wind Spatial Framework implements the requirement of SPP paragraph 161 with instruction to LDPs provided in paragraph 4.27 of the Proposed Plan. In the Proposed Plan the 'area not exceeding 2km around cities towns and villages' is described as a '2km separation zone around settlements' for ease of reference. The fourth line of Proposed Plan paragraph 4.27 clarifies that this is a maximum of 2km to be applied by Local Development Plans. Figure 4.2 relays the categories listed in SPP table 1 and adds a footnote that 'Areas with potential' will be 'Subject to landscape capacity and other assessment'. This reflects the elements of further consideration as is included in SPP. **No modification proposed.**

Gullane Area Community Council, Lammermuir Community Council, Mr Charles Strang

SDP figure 4.2 is required to reflect the group categories, as set in table 1 page 39 of SPP (and listed above). The SDP cannot add additional areas to these groupings outwith those stated in SPP. **No modification proposed.**

## **Strategic Wind**

### Scottish Government

The Onshore Wind Spatial Framework (Figure 4.2) and paragraphs 4.27 to 4.29 in the Proposed Plan set out SESplan's approach to wind farm development and repowering. Figure 4.2 gives an indication, at a regional scale, of areas where there may be opportunities for new wind farm development. The Proposed Plan sets out in paragraph 4.28 how the plan's content will be further supported by a Cross-Boundary Wind Farm Working Group who will identify the strategic capacity for wind farms in the region and strategic repowering opportunities.

SESplan's Main Issues Report (REF) confirmed that many of the most suitable and least environmentally sensitive locations for wind farm development in the region had already been developed. Whilst SESplan recognise there may be further opportunities in the region and indeed opportunities around repowering, these are not considered to require separate strategic supplementary guidance.

A number of SESplan member authorities in areas where most wind farm development occurs or is likely to occur, have existing, or are in the process of updating, their own Supplementary Guidance and Landscape Capacity Studies. There are also a number of other sources of wind development guidance such as those produced by Key Agency SNH (REF). SESplan would consider producing another layer of guidance to be unnecessary, adding to the complexity for developers and communities. In addition the recent Planning Review has indicated a need for there to be less supplementary guidance in the planning system.

SESplan consider that the Proposed Plan sets appropriate strategic direction for wind development at SDP level and that this is consistent with other SDP areas. The addition of a SESplan Wind Farm Working Group, gives further opportunity for relevant SESplan member authorities to undertake collaborative work. SESplan do not consider it necessary for the outcome of the Wind Farm Working Group to be Supplementary Guidance as it would be unlikely to add standalone value to the development plan. **No modification proposed.**

### **Wind Farm Development Including Extensions and Repowering**

#### Borders Network of Conservation Groups, Cockburn Association

The Proposed Plan in paragraph 4.29 instructs Local Development Plans will “set out a full range of additional considerations they will apply to wind farm proposals.” All types of wind farm development including new, extensions and repowering can be considered under the term ‘wind farm proposals’.

The specific guidance on the siting, height, appearance, infrastructure, community and environmental impacts associated with wind development, including the repowering of wind farms, will be subject to policy in Local Development Plans, as indicated above, and assessment under the Development Management process. It is considered that detailed advice on these matters would not be appropriate in the Strategic Development Plan. **No modification proposed.**

#### EDF Energy, EDF Energy Renewables Ltd, SSE Renewables Ltd

It is considered that, whilst there could be potential in the region for wind farm extensions, these would be best considered by local authorities using the Development Management process supported by the policy of Local Development Plans as indicated above. **No modification proposed.**

#### Lammermuir Community Council

New wind and other renewable or low carbon energy development is a key component of national policy in SPP and the NPF and the SDP is required to reflect these policy positions. **No modification proposed.**

### **Strategic Heat Infrastructure**

#### Edinburgh BioQuarter Partners, Liberton and District Community Council, Mrs Mirabelle Maslin, Roslin and Bilston Community Council, Scottish Government

Paragraph 4.25 and table 3.1 Placemaking Principles set out SESplan’s approach to strategic heat, stating the need for Local Development Plans to identify opportunities for co-locating sources of high heat demand and supply.

SESplan notes comments that the Proposed Plan could identify opportunities to link urban networks across local authority boundaries. However, while it is accepted that opportunities for heat networks may cross local authority boundaries, solutions for realising these rely on planning at a more detailed scale than what is achievable at SDP level.

SESplan consider that preparing additional guidance, or a heat map at a strategic scale, would not add value to the plan beyond what is already available at a national level in the Scotland Heat Map (REF) and feels this role would be better performed through Local Development Plans (as stated in SPP paragraph 158)

who can analyse heat data in relation to their site specific allocations. Work has already been undertaken by SESplan member authorities such as Fife Council on this matter.

Currently the direction of energy and heat infrastructure is subject to national consultations through the Scottish Energy Strategy (REF) and Local Heat & Energy (REF). This information may potentially succeed any guidance prepared at the strategic level.

SESplan consider that the Proposed Plan makes it clear that Local Development Plans should identify opportunities for connecting heat networks in the context of placemaking and in addressing the low carbon and energy needs of the region. **No modification proposed.**

### **National Planning Framework and National Developments**

EDF Energy, Neart na Gaoithe Offshore Wind Ltd, Neart na Gaoithe Offshore Wind Ltd, Scottish Power Generation, SP Energy Networks

It is considered that through the Significant Business Clusters paragraphs 4.1-4.7 and table 4.1 and Low carbon Economy section paragraph 4.26 the plan identifies strategic sites and opportunities for the servicing and manufacture of offshore wind and other low carbon energy capture or generation opportunities reflecting and supporting, where relevant, those sites identified in the National Planning Framework as well as National Renewable Infrastructure Plan (REF) sites. SESplan do not repeat national policy, such as SPP, as there is no need to reiterate this. **No modification proposed.**

### **Energy Storage and Infrastructure**

Hargreaves Services, RES, Scottish Government

The plan makes reference to energy storage in relation to the Cockszie and Longannet sites and whilst no specific reference is made to energy storage in relation to wind use, this is a potential outcome of the Cross-Boundary Wind Farm Working Group. In addition, energy storage would, in many cases, take place where generation occurs rather than across local authority boundaries. **No modification proposed.**

### **Region wide energy plan**

Midlothian Green Party, Moorfoot Community Council, Northumberland County Council

The SDP, along with national policy statements, provide a basis for regional contest in renewable energy planning. **No modification proposed.**

### **Smaller Scale Proposals and application to existing settlements**

Cramond & Barnton Community Council, Edinburgh Association of Community Councils, North Berwick Community Council, Roslin and Bilston Community Council, Mr Charles Strang

It is noted that smaller scale, domestic proposals and improvements to existing buildings can make an impact on carbon emissions, however it is considered that these measures cannot be accurately reflected in strategic policy and would be more appropriately addressed through Local Development Plans, Development Management and other means such as Building Standards. **No modification**

**proposed.**

**Other**

Denholm and District Community Council

It is recognised within the plan that the Scottish Borders have already made a significant contribution to wind developments. National policy and the Development Plan (Strategic Development Plan and Local Development Plan) provide protection to key areas from inappropriate wind development and Development Management assesses wind applications for their impact on a case by case basis. On this basis, it would not be considered appropriate to exclude an entire local authority area when measures are already in place to protect areas from inappropriate development. **No modification proposed.**

EDF Energy, EDF Energy Renewables Ltd, SSE Renewables Ltd

The source of the quoted figures on Scotland's performance against renewable energy and electricity targets and carbon emission are not known, however, it is considered that the Spatial Strategy and Low Carbon Economy sections of the Proposed Plan recognise the importance of a sustainable and low carbon region through reducing commuting and providing a strategic basis for renewable energy such as wind. It is not considered that the text in paragraph 4.27 is negative in stating that the region has a good track record in contributing to the low carbon economy. Peatland habitat is protected through SPP in table 1 page 38. **No modification proposed.**

Roslin and Bilston Community Council

The SDP's Spatial Strategy sets out how new development will be directed to locations which minimise the need to travel or which provide low carbon travel options. **No modification proposed.**

RSPB Scotland

Whilst the plan does not specifically reference the need to ensure development does not have negative impacts on wildlife and the environment, it is considered that this protection is delivered through other means including European and national designations, Environmental Impact Assessments and the Development Management process. The Plan as a whole is assessed for its environmental impacts through the Environmental Report, 2016 (REF). **No modification proposed.**

Cockburn Association

Monitoring vehicle emissions is not a function of the SDP. **No modification proposed.**

12 representations supporting this section of the Proposed Plan are also noted.

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]

<b>Issue 8</b>	<b>Increasing Housing Delivery</b>	
<b>Development Plan reference:</b>	<b>Pages 42-45, paragraphs 5.1-5.4, Table 5.1-5.2</b>	<b>Reporter: [Note: For DPEA use only.]</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Aithrie Estates (032643)  Ashfield Land (038483)  Barratt &amp; David Wilson Homes (799597)  Mr Keith Bedborough (856480)  CALA Management Ltd (929806)  A.J.C. Clark (930956)  Cockburn Association (037249)  Crawford and Douglas Ritchie (040552)  Damhead &amp; District Community Council (039328)  Edinburgh Association of Community Councils (040476)  Eskbank &amp; Newbattle Community Council (891202)  Gladman Scotland (783418)  Grange and Prestonfield Community Council (790304)  Gullane Area Community Council (037068)  H&amp;H Group Plc (927998)  Hallam Land Management Ltd (037571)  Hallam Land Management Ltd (039805)  Hargreaves UK Services Ltd (038489)  Homes for Scotland (040551)  Juniper Green Community Council (028859)  Kelso Community Council (039365)  Lawfield Estate (930075)  Liberton and District Community Council (790396)  Mactaggart &amp; Mickel Homes (038949)</p> <p>Mrs Mirabelle Maslin (928549)  Midlothian Green Party (778339)  Moorfoot Community Council (906008)  Murray Estates (930087)  Musselburgh Conservation Society (927996)  New Ingliston Ltd (929755)  Park Lane (Scotland) Ltd (039990)  Peebles Community Trust (810911)  Persimmon Homes (040349)  Prestonpans Community Council (039835)  Roslin and Bilston Community Council (790524)  Rural Renaissance (039402)  Mr Russell Salton (039632)  Mr Julian Siann (024823)  Scottish Property Federation (037013)  Shawfair LLP (039940)  Shepherd Offshore (Scotland) Ltd (038954)  South West Communities Forum (805601)  Stewart Milne Homes (930082)  Mr Charles Strang (907037)  Taylor Wimpey and Barratt Homes (040609)  Wallace Land Investment &amp; Management (930071)  Wemyss &amp; March Estate/Socially Conscious Capital (037270)  WS Crawford (040107)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Use of Housing Need and Demand Assessment (HNDA), identification of Housing Supply Targets (HSTs) and Housing Land Requirements (HLRs)	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Aithrie Estates</u>  Plan identifies surplus of housing land based on need assumption lower than</p>		

supply. Difficult to understand the purpose of adopting HSTs which require less development than implied by the available housing land. SESplan and its member authorities have no control over the development level represented by the housing land supply. The level of affordable housing is set at an unacceptable and uneconomic level unless the benefit of higher growth is acknowledged.

#### Ashfield Land, Hargreaves Services

Housing supply targets should meet the HNDA all tenure requirement.

Local authorities should deliver requirement of effective sites.

Should not have an over-reliance on Edinburgh as it is not meeting shortfall.

Flawed strategy that does not guarantee housing delivery.

#### Ashfield Land

Delivery should be increased through a range of sites and localities near Edinburgh, such as Goshen Farm (Promoting site).

#### Barratt and David Wilson Homes, Lawfield Estate, WS Crawford

Full allowance of HNDA requirements for the chosen future scenario should be made. The proposed plan provides for 15,000 units less than required and whilst this is based on assessment of affordable housing delivery, this does not take full account of the potential for the development industry to provide below-market housing models to contribute further to this demand. Combined affordable and market target of 5,321 per annum is higher than the average in the last decade but not as high as the 2004-08 period (6,293 per annum). HSTs make no allowance for backlog demand and dismiss shortfalls against previous structure plan and the 2013 approved Strategic Development Plan (SDP1).

To reflect historic failures and to meet strategic housing requirements (SDP1 and previous Structure Plan), the generosity allowance should be increased to 20%.

Full HNDA and 20% generosity should be reflected in housing for 2030-38 period.

#### Keith Bedborough

Include the breakdown of housing demand to ensure that development is matched to the correct category of demand to ensure we are not building too many of one type and not enough of another. Developers are more interested in profit than trying to create sustainable communities.

#### CALA Management Ltd

Proposed Plan must not reset housing requirements without factoring in delivery failure in recent years. Not meeting full HNDA estimate would exacerbate rents and house prices, and make regional less economically attractive. Reasons in paragraph 5.4 have not been properly justified and explained given that there are no environmental or technical constraints to the delivery of housing in the area

HSTs are a significant departure from HNDA and not ambitious. Do not accord with National Planning Framework 3 statement "led by SESplan, we wish to see greater and more concentrated effort to deliver a generous supply of housing land in this area". HSTs do not accord with Ministerial letter to CEC regarding LDP adoption.

Affordable HSTs should not be set higher than 25% otherwise deliverability will be affected. Not possible to not allow additional sites, then set a 50% affordable housing requirement as existing sites cannot be 'retrofitted'.

Plan should match HNDA base dates, with HSTs set from 2012. Period pre 2018 housing need cannot be ignored.

Cala supports Homes for Scotland Response, including 20% generosity margin and accompanying Rettie submission.

Require all tenure approach as demonstrated in Glasgow Clyde Valley Reporter's Findings.

#### A.J.C. Clark, South West Communities Forum

Proposed Plan is not robust or credible in post Brexit economic situation. SESplan housing need figures have wildly differed over last few years. General Registers of Scotland/National Records of Scotland warn that figures can only be treated with a degree of realism for 5 years, with a progressive fall-off in reliability over the following 5 years. So HSTs should be for no more than 10 years maximum.

HSTs 2018-2030 cannot be accurate to a single digit so round to nearest 50.

Edinburgh had a net student increase in economically buoyant years from 2001. But student population has remained static since 2011. Situation is now different (oil industry decline, while commerce, industry, the universities and the financial industries are being forced to review futures post Brexit) and this will be reflected in the main population with economic decline. If proposed strategy is pursued, vital farmland that could be used to enhance exports will be lost for housing that people neither want nor can afford. Reduce pace of growth and plan timescales.

#### Cockburn Association

The strong emphasis upon economic growth in NPF3 is likely to adversely affect the application of environmental policies.

Question HNDA and migration assumptions as they are projections which will be inaccurate over a longer period. Should be limited to 10 years. Uncertainty over population projections used to calculate housing need and demand. Impacts of Brexit on housing demand are not yet known. The HNDA is too large and complex for lay peoples/groups to understand. Land used to meet HNDA outputs will damage the environment and countryside of south east Scotland and loss of Green Belt.

Could need and demand be distributed to other parts of Scotland, especially where there is population decline? Edinburgh could over-heat like South East England. Greater understanding is required of student numbers and projections in Edinburgh.

Offices clearly unoccupied and surplus to original requirements for more than 5 years should be considered for conversion to housing.

There needs to be more focus on different types of housing - especially family and affordable housing - and the land supply, site and location requirements for such housing.

Question the generosity margin for land supply after Brexit. It will lead to land being released for development in the wrong place, with detrimental amenity and environment impacts.

The (limited) available survey evidence suggests that citizens are opposed to major growth in the size of Edinburgh. These views and emerging community plans need to be taken into account in developing plans for the future of the city-region.

#### Damhead & District Community Council

Level of housing in Midlothian is contrary to Green Network principles.

#### Edinburgh Association of Community Councils, Grange and Prestonfield Community Council

HNDA should be re-run and HSTs re-identified based on post Brexit future economic and migration prospects and availability of former MOD sites for housing.

10% generosity is not justified. It will lead to pressure on the green belt and designated open spaces, some of which is prime quality agricultural land needed for food production.

#### Eskbank & Newbattle Community Council

Affordable housing needs should be met as not doing so is incompatible with government objectives. If lower market/speculative housing allowances were set, there might be more incentive for builders to provide affordable/social housing.

#### Gladman Scotland

Disagree with given reasons for 10% generosity. An increase in supply would not harm the viability of allocated sites as effectiveness has a far greater impact on the delivery of individual sites, as opposed to the total number of sites allocated. Allocating additional sites increases the chance of a greater number of them becoming effective in the five-year period (and/or throughout the lifetime of the plan), thereby increasing the chance of meeting housing targets.

#### Gullane Area Community Council

The Gullane area cannot contribute to meeting the East Lothian HST or HLR due to poor transport infrastructure resulting in out-commuting by car.

#### H&H Group Plc

It is estimated that City of Edinburgh has a shortfall of 10,777 against its current LDP requirement. HSTs in table 5.1 should be increased by this shortfall.

Strong Economic Growth should be used to inform ambitious HSTs.

#### Hallam Land Management Ltd. (037571)

West Lothian HSTs are: neither ambitious nor generous; underestimated; do not reflect need and demand; and will not provide the required generous level of

housing land.

Hallam Land Management Ltd. (039805), Park Lane (Scotland) Ltd.

HSTs are not ambitious. They are not consistent with the HNDA. Infrastructure and environmental analysis in housing background paper is not transparent. Not clear how affordable HSTs will be delivered as delivery is largely reliant on private housing developments and more affordable models of market housing are not explained. Do not accept that majority of need is for affordable housing. 10% generosity is arbitrary.

Hallam Land Management Ltd. (039805)

Sustainable development at Craigiehall Barracks, Edinburgh, can contribute towards reducing housing land shortfall and in meeting future housing land allocations in 2030-2038 period.

Hargreaves Services

Delivery should be increased through a range of sites along growth corridors, such as at an expanded Blindwells.

Homes for Scotland

Support Ministerial letter to City of Edinburgh Council where it states "there is an unmet need and demand for housing across Scotland and we need to take the steps that are necessary to resolve this situation". Plan does not set out ambitious targets. Only be achieved if HNDA estimate is met in full on an all tenure basis with 20% generosity.

Support selection of Wealth Distribution scenario through analysis set out in supporting paper by Rettie. However, HSTs should meet HNDA estimate in full.

Plan period should match HNDA period and start in 2012 as required by Scottish Planning Policy (SPP) 114 "HNDA, development plan and local housing strategy processes should be closely aligned" and 115 stating that HST should be "based on HNDA".

Housing need should not be "artificially constrained by tenure" and an all tenure approach should be used. Not meeting full need and demand will not support delivery of 50,000 affordable homes and will lead to rent and price increases. Not sufficient evidence behind affordable HSTs which do not look further forward than a 4-5 year period for affordable housing funding. It should consider future funding initiatives including the ability for the private sector to deliver affordable housing and other mechanisms such as mid-market options. No evidence is provided as to how private the HSTs are increased above the HNDA estimates or how either the market or affordable HSTs have been calculated. HSTs do not accord with NPF3 statement that "led by SESplan, we wish to see greater and more concentrated effort to deliver a generous supply of housing land in this area". HSTs should have been included in the 2015 Main Issues Report (MIR). Redistribution from City of Edinburgh should either be 19% or 9.7% as supported by Wallace Land Investment and Management representation. Infrastructure constraints should not be used as justification for reducing HSTs. Solutions should be found between partners to remove constraints as indicated in the Planning Review. Environmental constraints

to the delivery of homes is unjustified and incorrect. No evidence is provided in Background Paper as to why City of Edinburgh can only accommodate 1,220 dwellings per annum. This evidence must be provided.

HSTs must be delivered on an all tenure basis, as required through the 2012 Glasgow Clyde Valley SDP. Increasing private housing supply significantly will provide flexibility and deliver a proportion of affordable housing and provide a moderating impact of house prices.

Do not agree that viability of allocated land could be undermined by an over-supply of land. Not all allocated sites will deliver over plan period and therefore a 20% generosity margin should be used, which allows for flexibility.

The Proposed Plan should be amended to meet the need and demand of the HNDA Wealth Distribution economic scenario in full, on an all-tenure basis, for 2030-2038 period. The Proposed Plan should identify HSTs based on either a 19% redistribution from City of Edinburgh or a 9.7% NET redistribution for the 2030-2038 period.

For the 2030-2038 period, the Proposed Plan should be amended to add a 20% generosity allowance and recalculate the HLRs accordingly.

#### Juniper Green Community Council

It is essential that growth and investment are spread and driven across Scotland, rather than concentrated in the already overcrowded South East City Region.

Migration is subject to major uncertainty. The findings of the CEC 'Brexit task force' should be taken into account before further green space is lost. The HNDA is a projection only. The 2014-based population projections suggest a lower rate of population growth for the SESplan area and for City of Edinburgh than previously. HSTs should be scaled back to reflect this, recognising the uncertainty of forecasts and not over allocating land for housing purposes. The HNDA can no longer be recognised as robust and credible. The period for projecting house numbers should be a maximum of 10 years.

There is little evidence that building more houses brings down house prices or that allocating large areas of land for housing will assist with affordability. Releasing more land is not going to create more homes for social rent. Scottish Government has to review how affordable housing is subsidised and increase investment. Scottish Government emphasis upon a generous allocation of land for housing exacerbates the pressure upon green land. Any generosity allowance should be removed.

#### Kelso Community Council

Delivering affordable housing at the expense of private housing means that there will be increasing demand for affordable housing. House prices are high and unaffordable for many because there is insufficient supply. Increase supply and prices will lower and hence not be a burden on tax payers.

#### Liberton and District Community Council

Question HNDA process and there is a growing gap between predicted needs and delivery. This requires a thorough review and more realistic figures set out in the Plan.

Mactaggart & Mickel Homes, Shawfair LLP, Shepherd Offshore (Scotland) Ltd  
HSTs are not reasonable, deliverable and supported by compelling evidence. Shortfalls in delivery to 2018 of SDP1 Housing Requirements must be brought forward unless reflected in HNDA.

HNDA Managers Guide has not been scrutinised and therefore should not be used as the basis for calculating HSTs. It is not ambitious and promotes misalignment between HSTs and the HNDA.

Support Strong Economic Growth which aligns with Proposed Plan Vision, therefore HST should be based on this. Migration fuelled growth and construction sector quotes from Housing Background Paper support strong economic growth. Chosen hybrid between Steady Recovery and Wealth Distribution is flawed and does not reflect NPF3 and SPP. HSTs should reflect City Deal. Current approach is negative and cautious. Environmental, cultural and greenspace impacts raised by those promoting lower growth can be addressed through development management and LDP process. Continual suppression of housing supply will exacerbate unaffordability. 2014 household projections will be published in January 2017. SESplan member authorities have shortfall against SDP1 Housing Requirements. This is referred to in City of Edinburgh LDP Reporter's Findings (page 113-114)

Housebuilders do not support 10% generosity. The reasons given for it are not clear and unjustified. As HSTs do not meet need, then a higher margin should be used, reflecting local circumstances. NPF3 states: 'more ambitious and imaginative planning will be needed to meet requirements for a generous and effective supply of land for housing in a sustainable way' (Paragraph 2.20). SESplan ignores NPF3 'Led by SESplan, we wish to see greater and more concerted effort to deliver a generous supply of housing land in this area.' 10% margin does not comply with SPP and reasoning given is questionable and has no evidential basis.

Mactaggart & Mickel Homes

SESplan Member Authorities have a shortfall in housing land supply. This was highlighted in City of Edinburgh LDP Reporter's Findings. "I find that a great range and choice of effective sites would be the most realistic means of increasing the rate of housing delivery in accordance with the challenging targets established by SESplan." (Paragraph 41, page 135). This is not addressed in the Proposed Plan and requires action before approval.

Infrastructure constraints cannot be used as a basis to constrain housing supply as new housing funds transport and education infrastructure. Considerations in setting HSTs fails to take account of the associated positive impacts housebuilding has in bringing about infrastructure, resources and environmental enhancements. New housing provides necessary funding for new education facilities.

Mrs Mirabelle Maslin

Not accepted that full affordable need cannot be met. Resources must be made available to deliver it. For a wide range of reasons it might not be possible to meet the targets, but the targets should not be undermined from the outset.

Forced premature changes in a geographical area which has substantial infrastructure problems is not the way to implement a coherent system of development

Midlothian Green Party

Requiring housing land for private houses to be built in Midlothian for those commuting to Edinburgh will not meet the central need for affordable housing. More land for private housing will reduce land for social housing, driving up cost of acquiring land. Disappointed that need for 4000+ affordable homes per annum cannot be met. Plan should specify details of social housing proposals.

Moorfoot Community Council

Remove 10% generosity margin as there are already over-allocations in Midlothian.

New Ingliston

HSTs and their methodology are unsuitable as they constrain supply and don't meet HNDA requirements. Proposed Plan should not ignore 7,000 home shortfall in City of Edinburgh LDP.

Support meeting greater proportion of housing in Edinburgh.  
Promoting suitability of International Gateway.

Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes

The Proposed Plan is planning for a supply of housing which is 15,528 homes less than the predicted need and demand, which is a shortfall of 20%. This scale of reduction in supply cannot be described as reflecting the HNDA estimate, which is a requirement of SPP. It would be better described as a significant departure from the HNDA. It is apparent that the addition to the market housing supply is far short of making up the affordable supply deficit, resulting in the large all tenure deficit. In our view, this is an extraordinary response to the current housing crisis in the City Region and the inadequate supply of affordable homes. Logic dictates that if the supply of housing is less than that needed, then demand will outstrip supply and this will distort the housing market with inevitable upward consequences for house prices. Indeed, this has been the recent history of planning for housing in the Edinburgh City Region, which would simply be exacerbated by the Proposed Plan. The Scottish Government is seeking solutions to the housing crisis, and this Plan unfortunately represents a backwards step in that regard. Support Rettie addendum as part of Homes for Scotland Submission.

At the very least, the HSTs should be increased to meet the all-tenure HNDA estimate. If the demand does not exist for the market housing, then they will not be built. The clear benefit in those circumstances is that there is a ready supply of land available to be developed when the demand arises. The ability of the private sector to deliver affordable housing is significantly under-estimated and there has been a lack of exploration by SESplan into potential mechanisms to increase the delivery

of 'mid-market' housing

There is no substantive evidence to justify the City of Edinburgh Market HST or the conclusion that higher market HSTs cannot be delivered in combination with agreed affordable HSTs due to infrastructure funding and environmental constraints (Housing Background Paper paragraph 7.23)

SESplan's consideration of generosity appears to be based on the assumption that the application of a generosity margin will entail more housing being delivered than identified in the HSTs, and that this will have a harmful impact. We disagree with both these points. The SESplan Councils optimism regarding the delivery of the established housing land supply is very high, and this needs to be reflected by the application of the highest level of generosity i.e. 20%. Not aware of a situation in Scotland where the supposed 'over allocation' of housing land has ever meant that existing housing allocations have become non-viable.

Approach to housing does not meet NPF3 requirement that "Led by SESplan, we wish to see greater and more concerted effort to deliver a generous supply of housing land in this area". Plan position does not reflect national concerns regarding the delivery of housing in the city region.

Previously raised concerns that HSTs were not consulted upon during MIR. Should have been consulted upon prior to Proposed Plan. Situation is the same as SDP1 with the Proposed Plan seeking to provide less housing than required. This led to plan modification and supplementary guidance and subsequent delays in LDP production.

#### Musselburgh Conservation Society

East Lothian and City of Edinburgh allocations are too high on top of existing commitments from SDP1. Will cause unacceptable social and traffic impacts.

Does not support approach outlined in paragraph 5.13 or housing numbers identified in table 5.3. Housing numbers for this period should be significantly reduced both in City of Edinburgh and East Lothian. HSTs for City of Edinburgh may undermine key aspects of the Vision of the plan.

#### Park Lane (Scotland) Ltd.

Sustainable development at Ratho North can contribute towards reducing housing land shortfall and in meeting future housing land allocations in 2030-2038 period

#### Prestonpans Community Council

HSTs should be reviewed to take account of level of housing delivery post 2008. An over-supply of housing land will affect the deliverability of already consented sites and hence further suppress delivery. Large parts of East Lothian, particularly the west, will be blighted by the uncertainty that an over generous requirement for land for housing creates

#### Roslin and Bilston Community Council

10% of housing is too much for Midlothian to deliver as it is a small area, much of it is marshy and undermined.

If 4,000 affordable homes per annum are needed these are what must be delivered. Provision is lagging far behind demand and resources must be found.

#### Rural Renaissance

30% generosity will provide the flexibility required to deliver strong economic growth and a range and choice of sites. SPP is not an absolute requirement. 10% is not sufficient. The Scottish Borders LDP Examination was based on a flexibility allowance of 18%, which is not sufficient when the preferred strategy is for strong economic growth. The Borders Housing Land Audit indicates that only 57% of Central Borders sites are unconstrained or effective, emphasising the need for 30% generosity. Scottish Borders HLR is insufficient. Homes for Scotland have calculated a shortfall of some 7,654 homes.

HSTs need to be based on housing market areas and reflect actual demand and activity. Targets should be based on factors including: Proper definition of functional housing market areas; Historic demand; Marketability; Availability of infrastructure; Service capacity; Proximity to transport; Functional housing markets need to be realistic in terms of their definition; and the locations within the housing market area where development is directed. In the past, Scottish Borders allocations have been made in towns with little evidence of demand or marketability.

#### Crawford and Douglas Ritchie

The 'Long Term Growth Corridor 2030' does not identify any location or scale of future growth for the period up to 2038 beyond local authority level. Consider that this should be clarified explaining the priority areas in each LDP required to meet the housing requirement.

#### Mr Russell Salton

Population of Edinburgh was roughly static until 10/11 years ago, coinciding with EU migration. This should be expected to reduce or decrease. Edinburgh's population as a proportion of Scotland's has remained static and therefore suggested net-migration from parts of Scotland has not occurred.

Projections show significant increase in single person households. Therefore this should be reflected in housebuilding and not in 4-6 bedroom homes.

#### Mr Julian Siann

Would like to see more varied housing developments.

#### Scottish Property Federation

Significant concern relating to not allocating sufficient land and that full HNDA estimate is not being met due to lack of infrastructure, lack of affordable housing funding and environmental constraints. This is based upon short term information and ignores affordable housing provided without subsidy.

There is a 25% net deficit which will lead to increasing unaffordability. Should be a direct link between HSTs and HNDA. A successful residential market is an important aspect of a thriving economic region. HSTs are not compatible with

Scottish Government vision to increase housing delivery or Edinburgh 2050 City Vision.

10% generosity is not ambitious or appropriate.

Shawfair LLP

Reasoning for 10% generosity margin is misleading and reasoning in plan and background paper is not accepted. To claim that allocation of land at a generous level undermines vitality of development sites is unfounded.

Midlothian could deliver a significantly greater level of housing than the HST, particularly at Shawfair.

Shepherd Offshore (Scotland) Ltd

Fife could deliver a significantly greater level of housing than the HST, particularly at Dunfermline

Mr Charles Strang

Representation requests that paragraph 5.13 be modified to make specific reference to loss of agricultural land. Representation also suggests that Table 5.3 be modified to include indicative figures for brownfield vs greenfield sites, including an assessment of the extent and qualities of the land to be lost.

South West Communities Forum

HNDA programme should be re-run post Brexit. Steady recovery is the most realistic scenario.

Generosity should be reduced to 2% given funding availability and uncertainties. There should be a new requirement that brownfield land must be within 5% of being used up before greenfield land release.

Future population should be spread across Scotland, not in congested areas.

Wallace Land Investment & Management

HSTs should match the same time period as the HNDA i.e. 2018-2030. The adjustment of the HNDA estimate to fit the 2018-2030 period as set out in Housing Background Paper paragraphs 4.5 to 4.7 has no rationale. HNDA is the basis for the HSTs. Having a different start date will not align the HSTs with the HNDA (SPP para 113) or be based on it (SPP para 115).

The distribution of the HNDA estimate away from City of Edinburgh should be based on either 19% or the 9.7% net distribution as evidenced in the Housing Market Area Assessment. The same method should be used to calculate the Indicative Scale of Housing Required in Table 5.3. Example tables are provided in full response. This approach should also be used for Table 5.3 setting out indicative housing required in 2030-2038 period.

Overall All Tenure HSTs should match the HNDA Wealth Distribution estimate. Artificially reducing the HSTs below this level risks the development strategy, regional economy and Scottish Government objective of delivering 50,000 homes.

No explanation is given for why the private HST has increased. No evidence of review of affordable housing funding is provided.

Delivery should be on an all-tenure basis with any new housing meeting overall housing land requirement as required in 2012 Glasgow Clyde Valley SDP. Tenure assumptions should not impose artificial or unnecessary restrictions on new housing provision.

A 20% generosity margin should be used, reflecting the constraints in delivering completions from the established land supply.

Considers that the location or scale of future growth for the period up to 2038 should be clarified, explaining the priority areas in each LDP required to meet housing requirement

Wemyss & March Estate/Socially Conscious Capital

Higher and ambitious growth scenario should be used to inform HSTs, consistent with NPF3 and City of Edinburgh Economic Strategy.

SESplan should have adopted 20% generosity to reflect growth projections.

Representation calls for expansion of land at Longniddry South be considered as a high priority in helping to provide East Lothian's longer term housing land requirement (2030-2038 period).

**Modifications sought by those submitting representations:**

Aithrie Estates

Change title of section 5 to Consolidating Housing Delivery.

Ashfield Land, Hargreaves Services

Increase HSTs to meet HNDA all tenure requirement.

Flexibility should be built into the housing land requirement figures provided in the plan and text should encourage joint working between local authorities.

The potential of Long Term Growth Corridors and Strategic Growth areas should be maximised.

Barratt and David Wilson Homes, Lawfield Estate, WS Crawford

Paragraph 5.3 - Replace references to 10% with 20%.

Table 5.1 (Housing Land Targets 2018-30) Amend figures to reflect full HNDA demand, i.e. attributing the net 'loss' of 15,000 units across SESplan authorities

Table 5.2 (Housing Land Requirements 2018-30) Amend figures to reflect 20% generosity allowance.

Table 5.3 - Modify to reflect a 20% generosity allowance and full HNDA wealth distribution scenario.

Keith Bedborough

Table 5.1 - Breakdown the HSTs by types of housing required.

CALA Management Ltd

Table 5.1 - Change to 'All Tenure HSTs' that fully reflect HNDA as per Homes for

Scotland response

Table 5.2 - Recalculate based on revised Table 5.1 with 20% generosity margin

A.J.C. Clark

Table 5.1 - Reduce HSTs in line with a likely declining growth future.

Table 5.1 - HSTs to be rounded to nearest 50.

Proposed Plan to plan to maxim 10 year timescale.

Cockburn Association

Modify City of Edinburgh HSTs taking community views and plans into account.

They should factor in demographics and types of housing required as 2011 population of Edinburgh is same as in the 1970s. This should include options for elderly people to downsize and targets for family housing across all tenures.

Revised City of Edinburgh HST should be 75% met on brownfield land.

Delete all references to 10% generosity.

Damhead & District Community Council

No more houses should be built to the north of Bilston in order to prevent coalescence with Damhead.

Edinburgh Association of Community Councils, Grange and Prestonfield Community Council

Table 5.1 - Modify HSTs based on post Brexit HNDA.

Delete all references to 10% generosity margin and modify table 5.2 as appropriate.

Eskbank & Newbattle Community Council

None requested, representation indicates:

Table 5.1 Increase proportion of affordable HST.

Gladman Scotland

None specified, representation indicates:

Increase generosity margin

Gullane Area Community Council

Restrict requirement for additional housing provision in outlying rural areas furthest from Edinburgh to discourage long distance commuting and in light of inadequate public transport infrastructure.

H&H Group Plc

SDP1 housing targets should be brought forward.

Table 5.1 - Increase City of Edinburgh HSTs by 10,777 (shortfall in delivering SDP1 requirements to 2024)

Hallam Land Management Ltd. (037571)

Table 5.1 - West Lothian HSTs should match those from SDP1 and accompanying Housing Land Supplementary Guidance (1,142 combined annual average).

Hallam Land Management Ltd. (039805), Park Lane (Scotland) Ltd.

None requested, representation indicates:

Increase HSTs to be consistent with HNDA  
Increase generosity margin

Homes for Scotland, Wallace Land Investment and Management

Paragraph 3.4 - Delete 3 bullet points

Table 5.1 - HSTs should equal HNDA wealth distribution estimate with either a 19% or 9.7% distribution from City of Edinburgh as set out in Wallace Land representation.

Plan period should be 2012-2030.

HSTs and HLRs should be recalculated on an all tenure approach.

A generosity margin of 20% should be used.

Table 5.3 - A generosity margin of 20% should be used.

Juniper Green Community Council

No modification specified, representation indicates:

The findings of the CEC 'Brexit task force' and the 2014-based population projections should be taken into account.

HSTs should be a maximum of 10 years.

Remove generosity allowance.

Liberton and District Community Council

No modification is specified, representation indicates:

Replace HSTs with more realistic figures based on delivery rates

Mactaggart & Mickel Homes, Shawfair LLP, Shepherd Offshore (Scotland) Ltd

Generosity margin should be re-assessed in compliance with SPP and NPF3, factoring in local circumstances.

Mactaggart & Mickel Homes

Table 5.1 - Modify HSTs by removing infrastructure constraints as a consideration.

Table 5.1 - Use Strong Economic Growth Scenario to inform revised HSTs, with significantly higher HST in East Lothian.

Mrs Mirabelle Maslin

Modify Housing Supply Targets so that all affordable need is met.

Modify first line of paragraph 5.13 to read as follows: 'Indications of the scale of housing required have been provided for 2030-2038 (Table 5.3) based on the 2015 Housing Need and Demand Assessment estimates. These figures do not take into account wider factors that may influence delivery or need for delivery, given the difficulty of making robust assumptions about these at this time.'

Midlothian Green Party

None specified, representation indicates:

Plan should meet full affordable housing need and set out specific social housing proposals for how it will be met.

Moorfoot Community Council

Delete all references to 10% generosity margin and modify Table 5.3 as appropriate.

Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes

At very least HSTs to meet full Wealth Distribution HNDA all tenure estimate. Generosity margin used should be 20%.

Musselburgh Conservation Society

Table 5.2 - Reduce East Lothian HLR and reallocate to West Lothian to aid regeneration.

Table 5.2 - Reduce City of Edinburgh HLR by at least 6,000 and reallocate to West Lothian and to Fife to aid regeneration.

Table 5.3 - Modify to reduce City of Edinburgh number of homes to approximately 10,000 Table 5.3 - Modify to halve the number required for East Lothian and re-allocate the remaining number of units to West Lothian to create a new settlement.

New Ingliston

HSTs should be consistent with HNDA requirements.

Peebles Community Trust

Affordable housing delivery in the Scottish Borders should match demand.

Prestonpans Community Council

No modification is specified, representation indicates:  
Review East Lothian HSTs based on post 2008 delivery.

Roslin and Bilston Community Council

Table 5.1 - Reduce Midlothian HST.

Table 5.1 - Increase combined affordable HST to match HNDA need. Set out how this will be achieved.

Rural Renaissance

Table 5.1 - Replace Housing Supply Targets with new Targets based on Strong Economic Growth Scenario and following factors: Proper definition of functional housing market areas Historic demand Marketability Availability of infrastructure Service capacity Proximity to transport

Table 5.2 - Recalculate HLRs based on 30% generosity.

Crawford and Douglas Ritchie, Wallace Land Investment & Management

Expand paragraph 5.13 to provide further guidance of the scale and location of growth within the each of the respective LDPs.

Scottish Property Federation

Require direct link between HNDA and HSTs in plan.

Increase generosity percentage.

Shawfair LLP.

Table 5.1 - Use Strong Economic Growth Scenario to inform revised HSTs, with significantly higher HST in Midlothian.

Shepherd Offshore (Scotland) Ltd

Table 5.1 - Use Strong Economic Growth Scenario to inform revised HSTs, with

significantly higher HST in Fife.

#### South West Communities Forum

Postpone plan until realistic post Brexit house numbers are available. HNDA figures can no longer be described as 'credible and robust'.

Reduce HST period to a maximum of 10 years.

Reduce generosity margin to 2%.

#### Mr Charles Strang

Modify Paragraph 5.13 (2030 - 2038 Period) to add reference to loss of agricultural land.

Modify Table 5.3 (indicative Scale of Housing Required 2030 - 2038, page 48) to add indicative figures for Brownfield and Greenfield sites, including an assessment of the extent and qualities of agricultural land proposed to be lost.

#### Wallace Land Investment & Management

Table 5.3 – 2030-2038 figures should equal HNDA wealth distribution estimate with either a 19% or 9.7% distribution from Edinburgh as set out in representation.

#### Wemyss & March Estate/Socially Conscious Capital

Table 5.1 - Increase HSTs based on higher growth scenario aligned with NPF3 and City of Edinburgh's Economic Strategy.

Table 5.2 - Use 20% generosity allowance.

### **Summary of responses (including reasons) by Planning Authority:**

#### **Housing Need and Demand Assessment**

Some representations raise the issue that the HNDA is not robust and credible due to projections being unreliable and that it was undertaken pre 'Brexit'. Regarding robust and credible status, SPP paragraph 113 states that "where the Scottish Government is satisfied that the HNDA is robust and credible, the approach used will not normally be considered further at a development plan examination".

SESplan received a letter from Scottish Government on 27 March 2015 (REF) confirming that its HNDA was considered robust and credible. Therefore it should not be considered for examination. Further, the nature of the impacts of Brexit on number of households in the SESplan area and migration to it from other parts of the Scotland, the UK and Europe are not yet known. Therefore it is most appropriate to base the HNDA, and subsequent HSTs on the most recent household projections available before the Proposed Plan was produced, which are the 2012 based projections used in the HNDA. It should be noted that the HNDA estimates are more than just a reflection of population and household projections.

Representations make references to fluctuating student demand in Edinburgh. However, specific accommodation for students is not addressed in the HNDA. This is a matter for the City of Edinburgh LDP.

SDP HSTs are reviewed every five years based on an updated HNDA. Any future changes in HNDA estimates for the SESplan region will be factored into the HSTs set on the next SESplan SDP for the 2023 to 2035 period, replacing the HSTs in this Proposed Plan.

A.J.C. Clarke, Edinburgh Association of Community Councils, Grange and Prestonfield Community Council, Juniper Green Community Council, Mr Russell Salton and the South West Communities Forum SESplan does not accept the modifications requested for revised HSTs based on a re run post-Brexit HNDA or declining economic future. **No Modification Proposed**

Cockburn Association

Do not accept modification that HSTs should 'factor in demographics and types of housing required as the 2011 population of Edinburgh is same as in the 1970's for the reasons set out above. The HNDA estimates are informed by future household projections and not past populations. Household size has declined significantly since the 1970s and therefore it is not appropriate to plan for the same level of housing stock as over 40 years ago. **No Modification Proposed**

A.J.C. Clark

Do not accept the proposed modification that HSTs should be rounded to the nearest 50. Whilst it is accepted that population projections cannot be accurate over a 12 year period, HNDA estimates are not projections but modelled need and demand based on a number of variables. Accepting the modification could result in under or over provision of housing land of up to 275 homes per LDP area over a 12 year plan period. **No Modification Proposed**

Mr Russell Salton

Edinburgh's and the SESplan population has risen to be a greater proportion of the overall Scottish Population. In addition, national forecast expect this trend to continue.

**Alternative Future to Inform Housing Supply Targets**

Mactaggart & Mickel Homes, Shawfair LLP, Shepherd Offshore (Scotland) Ltd, H&H Group Plc, Rural Renaissance and Wemyss & March Estate/Socially Conscious Capital

Do not accept the representations and modifications that HSTs should be based on the Strong Economic Growth alternative future in the HNDA. Section 5 of the Housing Background Paper (REF) sets out the process for evaluating which alternative future has been used to inform the HSTs. In summary, it concluded that Strong Economic Future is the least likely alternative future to occur (paragraph 5.27). None of the variables for this alternative future are supported by Oxford Economics research or the Core Housing Market Partnership (CHMP) as set out in the Housing Background Paper Table 5.1. Page 161 of the HNDA Report (REF) concludes that it not underpinned by evidence and the least likely alternative future to occur. Using the Strong Economic Growth alternative future would not lead to SPP paragraph 115 compliant 'reasonable.....and supported by compelling evidence' HSTs. Therefore the SESplan Housing Market Area (HMA) and LDP area HSTs should not be based on this alternative future.

NPF3 does not call for the use of a strong economic growth alternative future. Instead it is seeking to deliver sustainable economic growth. The two are not the same.

City of Edinburgh's Economic Strategy 'A Strategy for Jobs 2012-2017' does not set out housing or population growth expectations or aspirations. It does identify the importance of affordable housing. Whilst economic strategies should inform the Proposed Plan and its vision, they are not cited as critical evidence in setting HSTs. **No Modification Proposed**

Homes for Scotland, Wallace Land, Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes responses make reference to the Rettie Supporting Paper (REF) which argues why Wealth Distribution is the most likely alternative future based wholly on past trends. The past is not the sole barometer to the future and the paper makes no attempt to consider future trends as set out in the Oxford Economics supporting analysis (REF) as part of the robust and credible HNDA. The actual future outcome in terms of economic performance and migration will not be an exact match for either the Steady Recovery or Wealth Distribution alternative futures as set out in section 5 of the Housing Background Paper (REF). The actual outcome is likely to be somewhere in-between these two alternative futures based on the analysis on the HNDA.

The analysis of economic commentaries in the Housing Background Paper (paragraphs 5.17 to paragraphs 5.13) (REF) indicates that in the short to medium term the economic future most closely aligns with the Steady Economic Growth alternative future. Updated end 2016 commentaries from the same organisations (Fraser of Allander Economic Outlook December 2016 and Ernst and Young Scottish ITEM Club 2017 Forecast) (REF) do not present a significantly altered outlook. The combination of this additional analysis with the HNDA analysis indicates that the start of the plan period will be in the Steady Recovery alternative future but it is anticipated that this will improve towards the Wealth Distribution alternative future. Therefore over the 12 year plan period, the position is likely to be somewhere in between the two futures. To inform the HSTs the estimates from the Wealth Distribution alternative future were used.

Mactaggart & Mickel Homes, Shawfair LLP and Shepherd Offshore (Scotland) Ltd refer to the 2014 based Household Projections becoming available in January 2017. The 2014 based population projections show a reduced level of population growth compared to the 2012 based projections. However, the HNDA and its estimates are more than the use of household or population projections. It is a complex exercise, has been signed off as robust and credible and it should not be re-run every time updated information becomes available.

#### **Plan Period**

A.J.C. Clarke, Juniper Green Community Council, South West Communities Forum

Do not accept the modification that HSTs should only be for 10 years. SPP paragraph 118 (REF) states that HSTs in SDPs should be set for 12 years from the date of plan adoption (expected 2018). **No Modification Proposed**

Cala Management, Homes for Scotland, Wallace Land Investment and Management

Do not accept the modification that HSTs should start from 2012, from when the HNDA estimates begin. The following expands on the reasoning set out in paragraphs 4.3 and 4.4 of the Housing Background Paper (REF). SPP paragraph

115 (REF) states 'the HST is a policy view of the number of homes the authority has agreed will be delivered in each housing market area over the period of the development plan and local housing strategy'. For an SDP, SPP paragraph 118 states that this is up to year 12 from the expected year of plan approval. For the Proposed Plan this period would then be 2018 to 2030, not the date the HNDA provides estimates of housing need and demand from (2012 to 2037). The HNDA is a tool to assist authorities in setting HSTs, it does not set them. This is the same process for an LDP outside an SDP area set out in SPP paragraph 120 where HSTs and HLRs are required up to year 10 from plan approval.

The position in SPP is repeated in Circular 6/2013: Development Planning (REF), paragraph 41 which states "The spatial strategy should .....provide a locational strategy for new development up to year 12 from plan approval and a broad indication of the scale and direction of growth up to year 20." Terminology used in the representations such as 'start dates' or 'base dates' are not used in SPP, NPF3, Circular 6/2013 or the HNDA Managers Guide. SESplan HSTs will take effect at 2018 and run to year 12 (2030) as set out in Table 5.1 of the Proposed Plan. Table 5.3 then sets out the indicative level of housing required from year 12 to year 20.

Housing policy for the years up to 2018 is set out in SDP1 and will be superceded when the Proposed Plan is approved. It would not be appropriate for the Proposed Plan to 'start' six years before its approval by Scottish Ministers and eight years before the expected approval of the first subsequent LDPs. Using a 2012 'start date' would divorce the SDP from when its requirements take effect.

Pre 2018 need and demand estimates identified in the HNDA are not being ignored. As set out in paragraphs 4.5 to 4.7 of the Housing Background Paper, the broad scale of the backlog affordable housing need were used to inform the HSTs. This is not adjusting the estimates but using them to inform the Housing Supply Targets for the period that the SDP covers. Therefore the SDP is informed by (SPP 113) and closely aligned (SPP para 114) to the HNDA and its HSTs based on evidence from it (SPP 115). **No Modification Proposed**

### **Consideration of Backlog in Housing Delivery**

Barratt and David Wilson Homes, Cala Management Ltd, H&H Group, Homes for Scotland, Lawfield Estate, Mactaggart and Mickel, WS Crawford

Representations make reference to current shortfalls in delivery against the HLRs for each of the SESplan authorities set out in the Housing Land Supplementary Guidance. These shortfalls should be used to inform the HSTs and should not be reset. The scale of the difference in delivery versus requirements across the SESplan area is set out in the MIR Monitoring Statement (REF) and 2015 SESplan Annual Housing Update (REF). The latter explains that this difference is due to the 2008 recession and credit crunch which saw a subsequent steep fall in housing delivery. Whilst recent rates have increased they have not recovered to prerecession levels. Failure to meet SDP1 requirements is a failure in delivery by the housebuilding industry to changes in demand, development finance and mortgage availability. They were not due to a failure in land supply.

The SDP1 Housing Land Requirements are also based on meeting the full HNDA

estimate of need and demand set out in the 2011 HNDA regardless of funding available to deliver affordable housing, which has not matched need estimates. This position taken in approving the SDP in 2013 would not now comply with the requirements set out in the 2014 current SPP paragraph 115 (REF) and the guidance in the HNDA Managers Guide (REF).

As set out in Table 1, market housing completions from April 2011 to April 2015 matched or exceeded the comparable levels of market demand estimates\* in this period from the 2015 HNDA for all three alternative futures. Therefore there is no shortfall in delivery against market demand at present. The demand estimates from the 2011 HNDA and SDP1 Housing Land Requirements are becoming out of date and less relevant.

Table 1 – Market Completions vs HNDA Estimates

Alternative Future	Completions 2011/12 to 2014/15	HNDA Estimate 2011 to 2015	Difference
Steady Recovery	10,099	9,171	+928
Wealth Distribution	10,099	9,340	+759
Strong Economic Growth	10,099	9,763	+336

\*It should be noted that in the HNDA appendix 4, the year shown e.g. 2012 means the change from 2011 to 2012. Therefore the most approximate completions comparison would be that for the 2011/12 financial year. **No Modification Proposed**

**Housing Supply Targets to Match HNDA Estimate**

Paragraph 5.4 of the Proposed Plan briefly sets out the reasoning for HSTs in Table 5.1, including why the full Wealth Distribution alternative future HNDA estimate of affordable housing need cannot be set as the affordable HST. The Housing Background Paper (REF) set out in detail the policy context, background, methodology and reasoning behind the HSTs in the plan. This section of the S4 does not repeat sections of the Housing Background Paper. Instead it refers to content of the Housing Background Paper and expands on this when required to provide reasons as to why SESplan does not support the representations and suggested modifications to state the HSTs should match the HNDA Wealth Distribution estimates. This section has sub-headings A-D, followed by a summary.

The policy context and methodology followed reflects that required by paragraphs 113 to 118 of SPP (REF); sections 9 and 13 of the HNDA Manager’s Guide (REF); and section 7 of the Local Housing Strategy Guidance (REF). All relevant policy and guidance is set out in section 2, and then in greater detail in Appendix A of the Housing Background Paper. The critical guidance is SPP is paragraph 115 which states “Plans should address the supply of land for all housing. They should set out the housing supply target (separated into affordable and market sector) for each functional housing market area, based on evidence from the HNDA. The housing supply target is a policy view of the number of homes the authority has agreed will be delivered in each housing market area over the periods of the development plan

and local housing strategy, taking into account wider economic, social and environmental factors, issues of capacity, resource and deliverability, and other important requirements such as the aims of National Parks. The target should be reasonable, should properly reflect the HNDA estimate of housing demand in the market sector, and should be supported by compelling evidence”.

Representations by Shepherd Offshore, Shawfair LLP and Mactaggart and Mickel state that the HNDA Managers Guide should not be used to inform HSTs. SESplan disagrees with this as it is a government approved document. Scottish Government representations on the East Ayrshire LDP make this clear “To determine the HST, factors as set out in the HNDA Manager’s Guide and the LHS guidance should be considered. For the affordable housing element of the HST this includes the amount of funding that is likely to be available” (Page 58 of East Ayrshire LDP Examination Report) (REF).

Chapter 3 of the Housing Background Paper sets out the approach to housing in the MIR. Chapter 4 then sets out the process for identifying HSTs in the Proposed Plan. This was:

- Review HNDA alternative futures to inform HSTs (Chapter 5).
- Use the requirements in SPP paragraph 115 and factors in HNDA Managers Guide to set Affordable (Chapter 6) and then Market HSTs (Chapter 7).
- Factor in demolitions (chapter 8)

The HSTs agreed by SESplan and its member authorities are then set out in Chapter 9. It also sets out the approach identifying the scale of housing required in the period from year 12 to year 20 (2030-2038).

- **A - HSTs do not correspond with SPP**

Several representations insist that because the HSTs do not match the HNDA ‘requirements’ then they do not conform with SPP (REF). This is incorrect. The HNDA does not have ‘requirements’. Instead it provides estimates of need and demand. This is made clear in the HNDA Managers Guide (REF) paragraph 9.3 “The HNDA gives a statistical estimate of how much additional housing is required, whereas the Housing Supply Target gives an estimate of how much additional housing can be actually be delivered by authorities.” It is therefore clear that the HST is about delivery.

The plan and the HSTs should be “based on evidence” (SPP15) from the HNDA but “the HNDA and the HST are not the same and are therefore are not expected to match” (HNDA Managers Guide 9.1) due to a full consideration of other factors. These are set out in SPP paragraph 115 and 13.4 of the HNDA Managers Guide and are referred to in the Housing Background Paper (REF).

This approach is confirmed as the Scottish Government intention in their modification sought to the East Ayrshire LDP “The Plan should provide an overall HST that takes into account all factors and is realistic and deliverable.”(Reporters Findings page 60) (REF).

- **B - Affordable HST Meeting Affordable Need Estimate**

It is disputed by some representations that the affordable HST should not be less

than the estimate of affordable need from the HNDA due to the availability of funding for affordable housing. This is incorrect. One of the factors for consideration in setting HSTs in paragraph 13.4 of the HNDA Managers Guide (REF) is the 'availability of resources'. This includes the availability of funding to deliver affordable housing so that deliverable HSTs can be set. This is confirmed by the Scottish Government in the summary of their response to the East Ayrshire LDP "To determine the HST, factors as set out in the HNDA Manager's Guide and the LHS guidance should be considered. For the affordable housing element of the HST this includes the amount of funding that is likely to be available." (Reporters Findings Page 58) (REF). This disproves the Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes representations which claim SESplan are misinterpreting the Scottish Government intentions of SPP paragraph 115 (REF). SESplan maintains that only the Market HST "should properly reflect the HNDA estimate of demand in the market sector" (SPP paragraph 115).

- **C - Affordable Housing Need and Funding Analysis**

Representations from Hallam Land Management and Park Lane (Scotland) Ltd doubt that over 50% of the need and demand is for affordable housing. This is incorrect as the HNDA sets out that over 60% of the estimate is the need for affordable tenures (Table 4.2 of Housing Background Paper) (REF).

Representations make reference to a lack of information and analysis of affordable housing funding. Paragraphs 6.3 to 6.6 of the Housing Background Paper set out the approach taken to analysing affordable housing funding. Each authority examined funding that was expected to become available and range of funding factors including Strategic Housing Investment Programmes (SHIPs). The SHIPs that were in preparation during 2016 are now available. Delivery programmes in SHIPs include mid-market rental products which some representations state that SESplan are not taking into consideration when setting affordable HSTs.

The affordable HSTs for City of Edinburgh reflect affordable housing programmes, both known and planned, including the Council's 21st Century Homes Programme. The target represents a significant increase in affordable housing provision compared to recent rates of delivery.

The latest SHIP (REF) for the period 2017/18 to 2021/22, identifies potential completions of 5,921 homes over the 5 year period which is consistent with the affordable housing supply target of 1,200 per year. Many sites identified in the SHIP are not yet approved. The number of units proposed in the SHIP is the highest it has ever been and would require to be supported by double the funding than was received by Edinburgh for 2016/17.

Table 6.2 in the Housing Background Paper sets out that whilst the subsequent net affordable HSTs are less than the Wealth Distribution HNDA estimates in each authority (by varying proportions), they are significantly higher than the annual average level of gross affordable housing completions achieved over the last five or ten years (Table 6.1). They do not include losses of affordable homes through demolitions whereas affordable HSTs are net of demolitions. Therefore the affordable HSTs are higher than the level of delivery in last parliament 2010-2015

when there was a 30,000 affordable homes delivery target for Scotland. Whilst the SESplan affordable HSTs only cover two years of the current parliament (2018 to 2020) the increase matches that of the Scottish Government to delivery 50,000 affordable homes. SESplan cannot confirm level of affordable housing funding from Scottish Government after this period and therefore they are based on the current forecasts and not long term speculation.

Each authority has committed to an affordable HST that is challenging and higher than they currently deliver to look to meet the affordable housing challenge indicated by the HNDA. However, SESplan cannot set out affordable targets in the Proposed Plan that have no reasonable chance of being delivered due to availability of resources. SPP paragraph 115 (REF) states that HSTs need to be reasonable and the Scottish Government has set out that they need to be realistic and deliverable. Based on the compelling affordable housing evidence it would not be reasonable for affordable HSTs to be set at wealth distribution HNDA affordable need estimate.

It is compliant with SPP that Affordable HSTs can be less than the estimate of affordable need based on the level of delivery that is likely. This is confirmed on page 69 of the East Ayrshire LDP Reporters Findings (REF). Regarding East Ayrshire setting an annual affordable housing supply target of 100 dwellings per annum, the Reporter states “Although well short of the HNDA figures, the council has sought to adopt a realistic approach which takes account of past performance and likely funding constraints. On that basis, the proposed plan calculated a shortfall for East Ayrshire of 252 units over the period 2013-2025: an average of 21 units per annum.” This position was accepted by the reporter in the examination and is now the affordable HST for East Ayrshire.

It should be noted that the affordable HSTs are not caps or ceilings. If greater levels of funding do become available and higher levels of affordable housing delivery are possible, SESplan authorities are not likely oppose these because the HSTs have already been achieved.

Roslin and Bilston Community Council, Eskbank & Newbattle Community Council, Midlothian Green Party and Mrs Mirabelle Maslin

For the reasons set out above, SESplan cannot set affordable HSTs that match the HNDA estimates of affordable need. **No Modification Proposed**

- **D - Consideration of Past Completions, Environmental Impacts and Infrastructure Constraints in Market HST**

Representations have questioned the consideration of environmental and infrastructure capacities and constraints in not setting HSTs that equal the HNDA estimates. Paragraph 110 of SDP1 (REF) states that “Environmental constraints and other restrictions on land availability within the city's boundaries” meant that full level of need and demand identified at that time could not be met within the boundaries. This situation has not changed significantly during the preparation of the Proposed Plan although a greater proportion of the SESplan HST is now met within City of Edinburgh.

Section 7 of the Housing Background Paper (REF) sets out the approach for

setting market HSTs. This included consideration of environmental and infrastructure capacity and constraints. Paragraph 7.8 referred to full analysis set out in the Spatial Strategy Technical Note (REF) and Interim Environmental Report (REF).

In summary the Interim Environmental Report Appendix D identified that delivery of the full estimate of HNDA need and demand in City Edinburgh (Steady Recovery - Concentrated Growth Scenario – 3,300 dwellings per annum) would result in the negative impacts on the following Environment Objectives:

- Protect and enhance natural heritage assets;
- Protect and enhance the built and historic environment;
- To Protect and enhance the landscape and townscape;
- To use resources sustainably;
- To minimise the impact on the soil quality and to adhere to contaminate land regulations; and
- Minimise flood risk and adverse significant effects on water bodies.

It is reasonable to assume that these impacts would be the same or worse if the full level of need and demand from the Wealth Distribution alternative future for City of Edinburgh was to be met in full in City of Edinburgh (3,908 dwellings per annum – Table 4.2 in Housing Background Paper).

Table 5.2 in the SESplan Audit within the MIR Spatial Strategy Technical Note (REF) set out the City of Edinburgh capacity and constraints analysis. Notable constraints recognised were the ability to deliver new schools which is affecting delivery of the current LDP and a highly constrained strategic transport network.

Paragraph 7.11 of the Housing Background Paper notes that the level of market demand identified in Table 7.1 could be delivered in all authorities except City of Edinburgh without unacceptable impacts on environment or infrastructure capacity. Combined with the affordable HST of 1,200 per annum, the subsequent combined annual average City of Edinburgh net HST of 2,696 could not be delivered within the capacities and constraints of Edinburgh. That combined level of house completions was not achieved even in the high dwelling completions era of 2004 to 2008 and has only been achieved once in the last 26 years (3,096 gross completions in 1998/99) (REF). Therefore it is not reasonable to set that as a combined average HST, net of demolitions, over a 12 year period. A 12 year period where the economy and housebuilding industry is still recovering from the credit crunch and recession.

The City of Edinburgh market HST takes account of the consistent increase in completions that will be required over a 12 year period from 2018 to 2030. As set out in table 7.2 of the Housing Background Paper, whilst the CEC 1,220 average market HST is less than the HNDA market demand average of 1,496 per annum, it is 53% higher than what has been delivered on average over the five year period (2010-2015) prior to the production of the Proposed Plan. Whilst market completions were higher in 2015/16, citing the change over a single year is misleading as nearly all completed schemes can be counted in one year even though much of the construction can take place in the previous year. Therefore this analysis of longer term completions is more appropriate.

The Housing Market Area Assessment (REF) sets out that SESplan is a single HMA with 13 Sub HMAs. This was accepted in the approval of SDP1 and the 2015 robust and credible HNDA. The SPP 115 (REF) requirement is that the market estimate of demand is met across the HMA. There is no requirement for the HST in City of Edinburgh to match the HNDA figure. Therefore the shortfall in the City of Edinburgh market HST of 276 market dwellings per annum against the City of Edinburgh market demand estimate must be met across the other 5 authorities.

Wallace Land Investment and Management, supported by Homes for Scotland, state that the distribution should be 19% or 9.7% from City of Edinburgh to the other authorities. These are the gross and net movement of house buyers from City of Edinburgh to the other SESplan authorities set out in the Housing Market Area Assessment (REF) as part of the HNDA. This mathematical approach is not appropriate as it does not consider a range of factors for identifying HSTs, as required by SPP and the HNDA Managers Guide (REF). The HMAA figures are based on the purchases of homes and therefore do not take account of those renting privately and new build purchases (and therefore the locations of those new homes) only form a small percentage of the overall sales market, which is dominated by the sales of existing properties. Therefore it is not appropriate to base the scale of location of new housing solely on it. This approach also does not take account of future planning influences and objectives that will change the direction and location where people move to in the future. The Wallace Land Investment and Management approach also looks to distribute affordable need. This is not appropriate as it cannot be expected for other authorities to meet affordable needs from other authorities when they cannot meet the affordable estimates for their own areas.

The Market HNDA estimate is also not a cap. Market HSTs can exceed the HNDA estimates if there is evidence that a higher level of market housing can be delivered. Combined with the need to meet the overall market demand figure, all the authorities except City of Edinburgh considered if they could justifiably exceed their market HNDA estimates. The reasons for this are set out in paragraphs 7.17 to 7.20 of the Housing Background Paper. The approach was qualitative and based on upward adjustments to the HSTs rather than calculated mathematical assessments. Therefore the level of information set out in the Housing Background Paper is appropriate.

As a result of upward adjustments to market HSTs compared to market estimates in East Lothian, Fife, Midlothian, Scottish Borders and West Lothian, the overall SESplan market HST exceeds the market HNDA estimate by 571 dwellings per annum (23%).

- **Housing Supply Targets to Match HNDA Estimates Summary**

Several representations state that the targets are not ambitious. SESplan disputes this. The targets are ambitious compared to current and recent levels of delivery, are reasonable and are based on evidence. They are challenging as they will require a sustained increase over recent completion levels to be achieved but they are considered deliverable. The market HSTs are clearly ambitious as they exceed the Wealth Distribution estimate. The Affordable HSTs are ambitious as they

require a significant sustained rise over recent and long term rates of affordable completions.

Representations state that the targets do not match Scottish Government aspirations and the statement in NPF3 (REF) that “Led by SESplan, we wish to see greater and more concerted effort to deliver a generous supply of housing land in this area.” SESplan disputes this. Firstly, the SESplan HSTs comply with SPP (REF) and other government guidance for setting HSTs. As Scottish Government documents, they reflect their aspirations and how they required HSTs to be set. Secondly, the statement in NPF3 relates to generosity not HSTs. Thirdly, the NPF3 was approved in June 2014 and that statement referred to the production of SESplan Housing Land Supplementary Guidance (adopted November 2014) (REF) and the subsequent LDP preparation. Representations make reference to the letter from Kevin Stewart to City of Edinburgh Council (REF) regarding the adoption of the LDP. SESplan considered that this letter is not material evidence in setting SESplan HSTs as it solely relates to the City of Edinburgh LDP. City of Edinburgh Council prepared a response to the letter which looks to clarify many of the points made (REF).

Responses make reference to the potential impacts on house prices, rents and the regional economy that will occur if the SESplan HSTs do not equal the HNDA estimates for the Wealth Distribution alternative future. Firstly SESplan does not agree that house prices will rise due to a lack of supply of market properties as the SESplan market HST exceeds market HNDA estimates. With regards to rents and the regional economy it is un-evidenced speculation as to what will happen as impacts on these are dependent on multiple factors. Affordable HSTs are set at levels which are considered challenging but deliverable based on potential funding levels and innovative forms of delivery but these are much higher than recent levels of affordable housing completions. What is clear is that as set out in Table 9.2 of the Housing Background Paper (REF), the combined annual average HSTs (5,321) are 35% higher than the combined annual average completions for the previous five years (3,941) and 9% higher than the last 10 years (4,877). Therefore delivery of these HSTs should see a significant improvement in regional economic performance over recent trends as housebuilding contributes to the economy in a range of ways.

If higher HSTs are set, then they will not be delivered based on market estimates from the HNDA and the likely availability of affordable housing funding. HSTs are required to be deliverable. Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes representations state that it doesn't matter if targets are not met because there will be a supply of available land if demand increases. This excess of land will not give certainty regarding delivery of the plan and subsequent impact on infrastructure investment and delivery. When setting a significant higher HST than recent completion rates the Reporter in the East Ayrshire LDP finds that “I agree with the council that an overly ambitious target risks creating an over-supply of housing land and the associated problems which that would bring” (Paragraph 7, page 66 of Reporters Findings) (REF).

With regards to the HSTs not equalling the HNDA estimate, the Scottish Government have not submitted any representations or proposed modifications.

Ashfield Land, Hargreaves Services, Barratt and David Wilson Homes, Lawfield Estate, WS Crawford, CALA Management Ltd, Hallam Land Management Ltd. (039805), Park Lane (Scotland) Ltd., Homes for Scotland, Wallace Land Investment and Management, Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes, New Ingliston, Scottish Property Federation

For the reasons set out above, SESplan does not accept the modifications that the HSTs should be increased to match the total HNDA Wealth Distribution Estimate. The HSTs in the Proposed Plan are reasonable, are higher than the estimate of demand in the market sector, are supported by compelling evidence and deliverable across the plan period. By achieving this they are compliant with requirements set out in SPP, NPF3 and the HNDA Managers Guide. **No Modification Proposed**

Homes for Scotland, Wallace Land Investment and Management

As SESplan does not accept the modifications to increase the HSTs to match the HNDA estimates, it does also not accept the modification to delete the 3 bullet points in paragraph 3.4. These summarise the reasoning behind the HSTs set out in the Proposed Plan. **No Modification Proposed**

Liberton and District Community Council

SESplan note the requested modification that HSTs should be based on realistic delivery rates. However, no modification is required to the HSTs as they are reasonable and deliverable and therefore realistic for delivery across the plan period. The Affordable HSTs are based on levels of funding that are anticipated to become available and therefore are realistic. The Market HSTs are based on levels of market demand and therefore can be expected to come forward with the land available. The market and overall HSTs are broadly within past completion rates set out in tables 7.1 and 9.2 of the Housing Background Paper. **No Modification Proposed**

Hallam Land Management (037571)

Do not accept modification that the Proposed Plan should roll forward the West Lothian Housing Requirement from the Housing Land Supplementary Guidance as the HST for the period 2018-2030. It would not be taking account of up to date factors to simply roll forward housing land requirements from SDP1 or purely base them on the level of supply. This would not comply with SPP or any related guidance. Sought modification conflicts with the separate Hallam Land Management representation (039805) that proposed that the HSTs should equal the HNDA estimates. The West Lothian HNDA estimate is significantly different than the SDP1 requirement. **No Modification Proposed**

Kelso Community Council

The Proposed Plan is seeking to increase the delivery rates of both affordable and market housing. The market HST is set above the level of estimated demand based on a consideration of other factors. **No Modification Proposed**

**'All Tenure' Housing Supply Targets**

Cala Management Ltd, Homes for Scotland, Murray Estates, Persimmon Homes,

Stewart Milne Homes, Taylor Wimpey and Barratt Homes, Wallace Land Investment and Management,

Do not accept modification that HSTs should be on an 'all tenure' basis.

The Proposed Plan accords with SPP paragraph 115 (REF) by having separate HSTs for affordable and market housing. The purpose of this is to ensure that both market and affordable housing targets are clearly identified and that delivery of both can be monitored and not blurred into an 'all tenure' completions level.

Separate targets are required because demand for market housing and need for affordable housing cannot be met by either sector. Focusing on an all tenure target would dilute the focus on the need to deliver affordable or market housing over the plan period. Affordable housing need may not be met by an increase in market completions, which could be due to a rise in market demand rather than people in affordable need getting access to new build market delivered dwellings.

Conversely, demand for owner occupier market properties would not be met by the provision of social rent properties.

Representations from Wallace Land Management and Investment and Homes for Scotland highlight quotes from the Reporters Findings into the Glasgow Clyde Valley SDP from 2012 as reasoning as to why the HSTs must be on an 'all tenure basis'. Here the plan was required to identify all tenure housing requirements. However, these arguments do not apply as that examination and subsequent modifications were made under the 2010 SPP. This did not require tenure specific and separate housing supply targets in the deliberate and specific way set out in 2014 SPP paragraph 115.

The HLRs in Table 5.2 are a combined, 'all tenure' figures. This is because this is about the level of land to be identified whilst the targets are about which tenures are delivered.

The Proposed Plan accords with SPP paragraph 115 by having separate HSTs for affordable and market housing. HLRs are tenure blind. **No Modification Proposed**

**Generosity**

SPP paragraph 116 requires that the number of new homes required to meet the HST should be increased by a margin of 10% to 20% to calculate the HLR. This creates a generous supply of land and will provide flexibility for the HSTs to still be met if programmed sites are not developed as anticipated. Reasoning for which margin is used has to be set out in the SDP.

Edinburgh Association of Community Councils, Cockburn Association, Grange and Prestonfield Community Council, Juniper Green Community Council, Moorfoot Community Council and the South West Communities Forum

As set out above the generosity margin has to be from 10% to 20%. Therefore reducing the margin used to 2% or 0% and removing all references to generosity would not be in compliance with SPP. **No Modification Proposed**

Barratt and David Wilson Homes, Cala Management Ltd, Gladman Scotland, H&H Group, Hallam Land Management (039805), Homes for Scotland, Lawfield Estate, Mactaggart and Mickel, Murray Estates, Persimmon Homes, Shawfair LLP,

Shepherd Offshore (Scotland) Ltd, Stewart Milne Homes, Taylor Wimpey and Barratt Homes, Wallace Land Investment and Management, Wemyss & March Estate/Socially Conscious Capital, WS Crawford

Do not accept modifications that current generosity margin is unjustified and that it should be increased to 20%.

Various representations confuse the purpose of the generosity margin. Wallace Land and Investment and Scottish Property Federation state that the 10% generosity allowance does not meet growth ambitions. The HSTs in the Proposed Plan reflect the growth ambitions to increase housing delivery over the 12 year period. Lawfield Estate state that to reflect historic failures to meet strategic housing requirements (SDP1 and previous Structure Plan), the generosity allowance should be increased to 20%. This is incorrect as the housing requirements for SDP1 were not met because of steep fall in house completions post-recession, lower levels of market housing demand and change in mortgage and development finance. Shepherd Offshore state that a higher margin should be used as need estimates from the HNDA are not being met in the HSTs. Murray Estates, Persimmon Homes, Stewart Milne Homes, and Taylor Wimpey and Barratt Homes responses state that the generosity margin is based on the assumption that a higher generosity margin will entail more housing being delivered than identified in the HSTs, and that this will have a harmful impact. HLRs and generosity margins are not about ambition or to ensure that additional houses over and above the target are built. A generous supply is to allow the HSTs to be met if sites are not built out as planned. It is not to increase the chances of delivering greater levels of housing.

Some representations refer to the statement in NPF3 (page 13) (REF) as justification that SESplan should use a 20% majority margin “Led by SESplan, we wish to see greater and more concerted effort to deliver a generous supply of housing land in this area.” This statement was included following the housing modifications to SDP1 (REF) and the requirement for subsequent Housing Land Supplementary Guidance (REF). It instructed SESplan that through the latter document, LDPs should be required to provide a generous level of housing land. NPF3 was formally published in June 2014, whereas the Housing Land Supplementary Guidance was formally adopted in November 2014. A generous supply of housing land has been identified through the adoption of the City of Edinburgh, Fife and Scottish Borders LDPs and ongoing preparation and examination of the East Lothian, Midlothian and West Lothian LDPs.

The HLRs in the Proposed Plan are generous as they are a 10% margin higher than the HSTs. Therefore it is generous as per definition in SPP paragraph 116 (REF) of a generous requirement is one which is 10% to 20% above the HST.

Paragraph 5.3 of the Proposed Plan sets out that a 10% margin was used because a higher margin could lead to an over-supply of land compared to demand with the subsequent effects on the viability of allocated sites. Further explanation behind the use of the 10% margin is set out in paragraphs 10.4 to 10.6 section 10 of the Housing Background Paper (REF). Increasing the generosity margin to 20% will not deliver more affordable housing as delivery of affordable homes is primarily related to the funding that is available rather than increased level of sites above the

HST.

The market HSTs have inbuilt generosity as they exceed the estimates for the Wealth Distribution alternative future, conditions for which are not expected to occur in full over the 12 years from 2018 to 2030. The actual level of market demand over the plan period may be less than the market HSTs. Therefore the HSTs are already generous by providing a greater level of land than likely demand and adding a further margin of generosity above 10% would lead to an over-supply of housing land and subsequent delivery related issues.

The position that viability of land would be affected by a higher generosity margin is challenged by representations. Allocated sites in the development plan would be less certain to be developed if further sites are required to be identified above the level of demand. This lack of certainty then affects communities and infrastructure investment, an issue that was highlighted throughout the Planning Review Panel Statement (REF). Supplies of land that significantly exceed demand do not provide infrastructure providers and authorities the certainty to plan for development to come forward across the plan period. It creates difficulty in committing resources and funding streams towards supporting development and infrastructure to see the strategy delivered. That an over-supply of land can have harmful impacts is reflected in the East Ayrshire LDP Reporters Findings “I agree with the council that an overly ambitious target risks creating an over-supply of housing land and the associated problems which that would bring.” (Paragraph 7, Page 66) (REF). It is considered that a 20% generosity margin applied to ambitious targets compared to recent and long term delivery would create an over-supply of housing land.

Wallace Land Management and Investment state that a 20% generosity margin should be used, reflecting the constraints in delivering completions from the established land supply. Whilst there is constrained land within current established land supplies, as set out earlier, they are delivering the level of market demand identified in the HNDA estimates (set out in Table 1 previously). What is holding back further housing completions is the level of funding to deliver needed affordable housing.

Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes representations state that the SESplan member authorities’ optimism regarding the delivery of the established housing land supply is very high, and this needs to be reflected by the application of the highest level of generosity i.e. 20%. This is not logical. If SESplan Councils have a high confidence in their housing land supplies being built out, then it would not need a higher generosity margin to ensure HSTs are met.

With regards to the generosity margin, the Scottish Government have not submitted any representations or proposed modifications.

For the reasons set out in the preceding paragraphs, in paragraph 5.3 of the Proposed Plan and section 10 of the Housing Background Paper, SESplan considers that the 10% generosity margin is robustly justified. **No Modification Proposed**

### Rural Renaissance

The 30% generosity margin proposed modification does not comply with SPP paragraph 116. Also it would further exacerbate the problems regarding certainty and over-supplies of land set out above. **No Modification Proposed**

### Ashfield Land, Hargreaves Services

SPP 118 is clear that Housing land Requirement is required to be set for the SDP area, each local authority and each functional HMA. Therefore it is not appropriate that flexibility is applied whereby one local authority area's HLR can be met in another. They have been set at levels factoring in deliverability in each local authority area and therefore flexibility is not required. SESplan local authorities will continue to work in partnership over a number of issues. **No Modification Proposed**

### **Concentrated in SE Scotland**

#### Cockburn Association, Juniper Green Community Council

The spread of growth across Scotland is a matter for the NPF. NPF3 (REF) makes clear that south east Scotland, as home to Scotland's capital and second largest city, is a major location for growth. Similarly the robust and credible HNDA (REF), concludes that there is housing need and demand projected for this part of Scotland. SESplan's role is to plan for the future of this area. SESplan does not have the role, remit or responsibility to plan for other areas of Scotland. **No Modification Proposed**

### **City of Edinburgh Housing**

#### Cockburn Association

Does not accept the modification that the City of Edinburgh HSTs should be reduced based on community views and community plans. The City of Edinburgh HSTs has been informed by the MIR process, including a 10 week consultation period. Previous SESplan responses in this schedule set out how it complies with SPP (REF) and the HNDA Managers Guide (REF). The Cockburn Association survey presented is not robust and cannot be used to make long term land use planning decisions.

Does not accept the modification that 75% of the revised City of Edinburgh HST should be met on brownfield land. The plan has a brownfield first placemaking principle and paragraph 5.9 specifically refers to brownfield land in Edinburgh to be given sequential priority before any greenfield sites in Edinburgh are required to meet the Housing Land Requirement or shortfall. The exact proportion of housing land supply in Edinburgh on brownfield land is a matter for the City of Edinburgh LDP. **No Modification Proposed.**

### H&H Group

The approach promoted that the City of Edinburgh HST should be increased by 10,777 does not comply with the requirements for setting HTSs in SPP and the HNDA Managers Guide and transcribed into the process set out in the Housing Background Paper and in this S4. The shortfall figure presented in the representation is also incorrect. The City of Edinburgh LDP Reporters Findings (REF) set out that the shortfall was to 2019 and not a shortfall in land supply and not even a shortfall in delivery over the entire plan period (to 2026). The reporter's

replacement for figure 7 (page 151 of report of examination) showed a minimal shortfall (408 units) in anticipated delivery over the plan period and with the additional sites recommended (which have been included in the adopted local plan), no shortfall is anticipated. The shortfall was in delivery by the development industry only. There is not shortfall in land supply.

### **East Lothian Housing**

#### Prestonpans Community Council

HSTs in East Lothian reflect the approach required by SPP (REF) and the HNDA Managers Guide (REF) and transcribed into the process set out in the Housing Background Paper and in this S4. The affordable HST maximises the potential funding to deliver affordable housing but cannot match the affordable need estimate in the HNDA for the Wealth Distribution alternative future. The market HST exceeds the demand estimate from the Wealth Distribution HNDA alternative future based on helping to meet some of the affordable need that cannot be met and based on what reasonable market delivery rates might be expected. This help meets some of the market demand that cannot be met in City of Edinburgh. The overall HST is higher than recent post-recession delivery levels but with the expected recovery, is reasonable over a 12 year period. **No Modification Proposed**

### **Midlothian Housing**

#### Damhead and District Community Council

The specific location of currently proposed housing in Midlothian is a matter for the Midlothian LDP and its ongoing examination. Paragraph 5.8 of the Proposed Plan sets out that there is already sufficient housing land supply in the Midlothian LDP to meet the Midlothian HLR for the next Midlothian LDP. However, this will depend on the land supply at the time of LDP preparation. **No Modification Proposed**

#### Roslin and Bilston Community Council

HSTs in Midlothian reflect the approach required by SPP (REF) and the HNDA Managers Guide (REF) and transcribed into the process set out in the Housing Background Paper (REF) and in this Schedule 4. The affordable HST maximises the potential funding to deliver affordable housing but cannot match the affordable need estimate in the HNDA for the Wealth Distribution alternative future. The market HST exceeds the demand estimate from the Wealth Distribution HNDA scenario based on helping to meet some of the affordable need that cannot be met and based on what reasonable market delivery rates might be expected. This helps meet some of the market demand that cannot be met in City of Edinburgh. The overall HST is in line with recent delivery levels in Midlothian, which are higher than pre-recession averages (Housing Background Paper Table 9.2). Paragraph 5.8 of the Proposed Plan sets out that there is already sufficient housing land supply in the Midlothian LDP to meet the Midlothian HLR for the next LDP. However, this will depend on the land supply at the time of LDP preparation. **No Modification Proposed**

### **Scottish Borders Housing**

#### Peebles Community Trust

Meeting the full level of affordable need in the Scottish Borders would not be reasonable or deliverable. The affordable HST is ambitious and higher than recent

levels of affordable housing delivery in the Scottish Borders. However, it does not match the level of need estimate from the Wealth Distribution alternative future. This cannot be met due to current and forecast levels of financial resources to deliver affordable housing. **No Modification Proposed**

### **Housing Types**

#### Mr Keith Bedborough

House types and household sizes are not the same thing. The HNDA does not provide information of the former and it is not the role of the SDPs to set this out. Matters relating to house types are more appropriate at an LDP or proposal level of detail. **No Modification Proposed**

#### Cockburn Association, Mr Russell Salton, Mr Julian Siann

Matters relating to house types are more appropriate at an LDP or development management level. Local Housing Strategies will include details on housing for the elderly. Local authorities do not seek a monoculture of house types to be delivered and paragraph 44 of SPP (REF) requires development to be adaptable. Regarding the re-use of office blocks, this is a more appropriate matter for LDPs and urban capacity studies. The HNDA indicates that there will be an increase in all household sizes not just single person. **No Modification Proposed.**

### **Other 2018-2030 HST Related Modifications**

#### Gullane Area Community Council

The purpose of the spatial strategy is to locate a greater proportion of development in Edinburgh to minimise levels of commuting in from remoter parts of the region. **No Modification Proposed**

#### Musselburgh Conservation Society

Do not accept modification to modify HLRs in table 5.2. Representation mistakes HLRs as additional housing land above that set out in SDP1, the Housing Land Supplementary Guidance and emerging LDPs. This is not the case as HLRs are the total amount of housing to be made over the plan period 2018-2030, not additional land supply from previous plans. HLRs for City of Edinburgh, East Lothian, Fife and West Lothian have been set so that need and demand is located as close to possible as to where it arises and not distributed elsewhere across the region to comply with spatial strategy objectives of locating housing nearer jobs, reducing need to travel and subsequent minimising of impacts on CO<sub>2</sub> emissions, climate change and congested transport infrastructure. **No Modification Proposed**

#### Aithrie Estates

Does not accept the modification to change the title of section 5 to Consolidating Housing Delivery. The section is called Increasing Housing Delivery because an increase above the current levels of house completions will be required to meet the HSTs set out in the plan. HSTs are based on meeting demand, not on how much housing land is available. **No Modification Proposed**

### **Housing 2030-2038 Period**

Paragraphs 9.7 to 9.10 in the Housing Background Paper (REF) set out the approach to setting indicative scale of housing required over the 12 to 20 period. For the Proposed Plan that will be the 8 years from 2030 to 2038. This approach

follow the requirements of SPP paragraph 118 which states “Beyond year 12 and up to year 20, the strategic development plan should provide an indication of the possible scale and location of housing land, including by local development plan area.”

Homes for Scotland, Wallace Land Investment and Management

The analysis by Wallace Land and Investment and supported by Homes for Scotland is not credible in this time period. To use pre-2013 owner occupier housing movement patterns for a housing period that starts 17 years later would continue past trends and would not be tailored to the relevant factors in that specific time period. The factors that apply in the first 12 years of the plan would be the most appropriate assessment of factors at this time. The HSTs that will be approved for this period will not be set until the next SDP. The HSTs will be reviewed twice before the 2030-2038 period begins. **No Modification Proposed**

Barratt and David Wilson Homes, Lawfield Estate, WS Crawford,

Using the exact HNDA estimates would not factor in that there is likely to be some relocation of need and demand as SESplan is a single housing market areas. **No Modification Proposed**

Barratt and David Wilson Homes, Lawfield Estate, WS Crawford, Homes for Scotland, Wallace Land Investment and Management

Generosity margins only apply in setting HLRs. SPP paragraph 118 is clear that HLRs are not required beyond year 12 of plan approval. Generosity margins and HLRs for the first five years of this period will be set out when this SDP is reviewed. **No Modification Proposed**

Mirabelle Maslin

Do not accept change as the HNDA is the best indication of the need for delivery in this period and it indicates that the total level of additional housing set out in table 5.3 is required. The HSTs will be reviewed twice before the 2030-2038 periods begins. **No Modification Proposed**

Musselburgh Conservation Society

Paragraphs 3.3 and 3.4 set out the approach to growth beyond 2030s. They provide an indication of the possible location of housing land to accompany the scale set out in Table 5.3. Assessments of the Housing Supply Targets and location of additional development will be undertaken during the preparation of next SDP. It would not be appropriate at this stage to indicate that half of the need and demand estimated for East Lothian and City of Edinburgh should be met outside these areas. **No Modification Proposed.**

Mr Charles Strang

It is not possible at this stage to have undertaken land capacity assessments for the 2030-2038 period as housing land capacities vary significantly over short periods of time. It is not possible to set out whether agriculture land will be required or indicative levels of brownfield and greenfield sites. **No Modification Proposed.**

Homes for Scotland, Crawford and Douglas Ritchie, Wallace Land Investment and Management

Paragraphs 3.3 and 3.4 set out the approach to growth beyond 2030s. They provide an indication of the possible location of housing land to accompany the scale set out in Table 5.3. The statutory review period for SDPs requires submission of a proposed plan within 4 years of the current plan's approval date. This presents several opportunities in the run up to 2030 to monitor progress and establish the principles necessary to clarify how Long Term Growth Corridors will be delivered. This will include which, if any of these corridors carries comparatively higher or lower priority. **No Modification Proposed**

Support was received from four organisations for Table 5.3 and paragraph 5.13.

**Promotion of Sites**

Ashfield Land (Number(s)), Hargreaves Services, Hallam Land Management Ltd. (039805), Park Lane (Scotland) Ltd.

The exact makeup of sites to meet HLRs is a matter for LDPs dependant on estimates of land supply during LDP production and site assessment undertaken at that time. Therefore it is not appropriate for the SDP to set out which sites should be identified in future LDPs. **No Modification Proposed**

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]

<b>Issue 9</b>	<b>Housing 2018-2030 Period</b>																																									
<b>Development Plan reference:</b>	<b>Pages 46-47, paragraphs 5.8 to 5.12</b>	<b>Reporter: [Note: For DPEA use only.]</b>																																								
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>																																										
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<b>Provision of the Development Plan to which the issue relates:</b>	<b>Housing land</b>																																									
<b>Planning Authority's summary of the representation(s):</b>																																										
<p><u>Aithrie Estates</u> Market housing is a key element of infrastructure funding. The provision of market housing in large part depends upon the success of the private sector to provide land and infrastructure at no cost to affordable housing providers. There is no logic to setting targets which do not accept these facts as SESplan and its member authorities have no control over the development level represented by the housing land supply.</p> <p><u>Ashfield Land</u> Plan should clearly acknowledge potential of accessible locations on the boundary</p>																																										

of Edinburgh in order to increase available sites for housing.

Barratt and David Wilson Homes, Lawfield Estate, WS Crawford

Statement in paragraph 5.8 that all areas with exception of City of Edinburgh can meet demand is not substantiated. Existing supply in tables 11.1 and 11.2 in the Housing Background Paper has to be assessed fully to gauge true, agreed, contribution between local authorities and development industry. Row B in tables 11.1 and 11.2 contain a numerical error. Total should be 19,354. This affects totals in rows H and J.

It is clear that City of Edinburgh, even at the most conservative estimates, will have a significant shortfall and this should be made clear so as to guide the local authority.

Barratt & David Wilson Homes

Criteria in paragraph 5.12 are too restrictive. The second bullet should be removed to ensure the all-tenure shortfall is addressed. Third bullet - wording is too vague. A 'significant' proportion is too ambiguous. The wording should be amended to reflect any contribution that is made from a proposed site is supported.

Keith Bedborough

The acceptance criteria for infrastructure development and the commitment to this needs to be much clearer (Who, What, When). Infrastructure should be completed prior to development.

CALA Management Ltd

Cannot set out 2nd and 3rd sentences in paragraph 5.8 as have not undertaken effectiveness analysis of sites and this is the role of the Local Development Plans (LDPs) to identify scale of shortfall. Shortfall in City of Edinburgh is significantly higher than estimate set out in paragraph 5.9.

Object to methodology in 5.11 as shortfalls must be carried over across plan period and must take current failures in delivery into account pre 2018. Proposed methodology is not accepted in planning appeals. When a shortfall occurs, presumption in favour of sustainable development in SPP paragraphs 32-35 should apply.

5.12 - Remove 2nd bullet as tenure specific is not supported by legislation. Glasgow Clyde Valley Strategic Development Plan (SDP) requires all tenure approach.

5.12 - Remove 5th bullet as green network is not a determining factor on housing locations.

Cockburn Association

Plan is not clear on use on vacant housing to meet need and demand. Stronger measures are required to steer development to brownfield sites, and to encourage development outside the Edinburgh Green Belt. Current brownfield priority is ineffective in refusing proposals. A mechanism needs to be devised to provide clear directions and incentives for the re-development of different categories of

brownfield land. Believe the use of brownfield sites must be an overall policy, irrespective of whether or not there may be a shortfall of housing land. Disposal of Ministry of Defence sites provide brownfield opportunities for windfall housing.

Uncertainties due to Brexit could affect the delivery of five-year land targets. The Proposed Plan should not penalise Local Authorities for not meeting housing targets due to possible Brexit effects/uncertainties. Paragraph 5.12 - 5th & 6th bullets: 'align' is weak. Replace with 'conform'.

Edinburgh Association of Community Councils, Grange and Prestonfield Community Council

There are no powers to prioritise brownfield sites unless regulatory powers or incentives/ disincentives are used.

Gladman Scotland

Concerned that the Spatial Strategy suggestion that the need for strategic growth will be largely met by land already identified in existing and proposed LDPs will act as a disincentive for local authorities to continue to actively monitor and manage their housing land supply as the plan period progresses. Concerned that the Proposed Plan is rolling forward previous allocations and the existing supply in LDPs. Proposed Plan cannot state with certainty that the existing level of supply is sufficient (as it does in paragraph 5.8), without LDPs first having carried out the assessment set out in paragraph 5.10 (with regards to the deallocation of undelivered, and by extension, ineffective sites).

Paragraphs 5.8, 5.10 and 5.11 are not consistent with each other; paragraph 5.8 suggests that the existing land supply set out in LDPs based upon housing requirements from the 2013 approved SDP (SDP1) will ensure that there is a sufficient supply of housing land to meet the housing land requirements over the 10 year period from the expected date of plan adoption. This is not consistent with paragraph 5.10 (which refers to the deallocation of sites which have been carried over a number of plan periods and remain ineffective).

Paragraph 5.11 5 year land supply method ignores unmet need from early in plan period and will not result in the plan aims being met and fail to meet the requirement in SPP paragraph 118 to ensure that the housing requirement is "met in full". Unmet need from previous years should be redistributed over the preceding five-year period.

Gullane Area Community Council

Unmet housing land requirement for the City of Edinburgh is met within the city.

Alignment with Countryside Around Towns policy and conservation area designations should be criteria in paragraph 5.12.

H&H Group Plc

Land at Riccarton Village (promoted) can meet land supply shortfalls in a sustainable location. Need to take pro-active steps to address shortfalls. Areas should be deemed acceptable either greenfield or brownfield to shorten planning process help meet shortfall.

Deallocation reference is supported but is not evidenced in practice. Instead of deallocation, identify as long term prospects and not identify as part of 5 year phasing. Realistic phasing is required.

Haddington and District Amenity Society

Paragraph 5.10 - Allowances for windfall sites should not apply to smaller towns and villages such as Haddington, as it has caused inappropriate development that does not meet the placemaking principles.

Hallam Land Management Ltd. (037571)

Support for 5.11 and 5.12 re: step change required, monitoring supply and maintaining 5 year effective land supply at all times.

Paragraph 5.12 continues SESplan policy but should be made clearer to properly reflect policy 7.

Hallam Land Management Ltd. (039805)

Support 2nd sentence of 5.9. Identification of the green belt inner boundary should take account of housing sites such as Cragiehall. Proposed Plan should identify the need for a green belt and the LDP the precise form and boundaries of it.

Homes for Scotland, Wallace Land Investment & Management

Paragraph 5.8, 2nd and 3rd sentences assume that there is sufficient housing land within each local authority, other than City of Edinburgh, to meet the housing land requirement. This evidence can only be determined through the preparation of emerging LDPs in accord with SPP (paragraph 119). Accordingly these sentences should be deleted.

Paragraph 5.11 5 year land supply calculation method will not meet Scottish Ministers' aim of meeting the HST and HLR in full over the plan period. It does not take account of the performance of the development strategy in the plan period to date, and does not deal with the situation where a surplus, or shortfall, emerges over plan period. In planning appeals, the calculation set out in Paragraph 5.11 has been rejected consistently by Planning and Environmental Appeals Division Reporters as inappropriate to determine whether the five year effective housing land supply is maintained.

The delivery of the proposed development strategy should be on an all-tenure basis recognising that new housing provided in any tenure will contribute to meeting the overall HLR across the SESplan region. This should be set out in paragraph 5.12.

Liberton and District Community Council

Support for paragraph 5.8 and for brownfield first in 5.9 subject to not leading to loss of employment land and replacement with new greenfield employment sites. Should be greater support to encourage development of longstanding sites. De-allocation may support developer preferred easier approach of greenfield first.

Consider this paragraph 5.12 is an open invitation for the development industry to bid for additional sites. An alternative approach would be to require the bringing

forward of effective sites in the period 6-10 years, an approach espoused by the City of Edinburgh Council in its response to the Reporter considering the City of Edinburgh LDP.

Mactaggart & Mickel Homes, Shawfair LLP, Shepherd Offshore (Scotland) Ltd

Caution should be employed at LDP level to ensure sites are not deallocated without prior and full consideration of action that could be taken in relation to infrastructure constraints to allow such sites to be continued for future development.

Midlothian Green Party

Provisions for de-allocation of housing land are supported but will require powers to deal with challenges to that policy.

Moorfoot Community Council

Paragraph 5.12 - Placemaking principles should be 'adhered to' not 'took account of'

Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes

Paragraph 5.8 of the Plan requires LDPs to ensure that there is a sufficient supply of housing land to meet the HLRs over the 10 year period from the expected date of plan adoption. This wording is less rigorous than Policy 5 of SESplan 1, which clearly identifies the imperative for LDPs to allocate enough land for houses to be built to achieve the HSTs. Policy 5 was approved by Scottish Ministers 2 years ago, and we see no reason to dilute those words

2nd sentence of paragraph 5.8 is a contentious assumption. SESplan 1 Supplementary Guidance contained reference to speculative and optimistic assumptions regarding the delivery of the established land supply that proved to be significant over-estimates in LDP examinations. It could be misleading and should be deleted. It is not the function of the SDP to identify the housing supply. Same applies to 1st sentence of paragraph 5.9.

In paragraph 5.9, the principle that priority should be given to brownfield sites is supported by SPP, but should apply over the whole SESplan area, given that shortfalls in housing may arise in all Councils. Moreover, to be realistic, the Plan should also make reference to the need for greenfield sites to be allocated or granted planning permission should there not be enough effective brownfield sites.

De-allocation reference in paragraph 5.10 is not necessary. The Housing Land Audit process should ensure that all stakeholders contribute the best information available and do not make over-optimistic assumptions regarding delivery. If there is no evidence that sites can become effective then they should be defined as constrained and make no contribution to the land supply. If they do become effective, then they can still make a useful contribution.

Paragraph 5.11 3rd sentence should be amended to be clear that each Council is responsible for its own HLR, and avoids the possibility of individual Councils arguing that its shortfall should be met in another Council area. Final sentence

does not reflect agreement between authorities and Homes for Scotland that shortfalls in delivery across plan period must be made up by the end of the plan period.

1st sentence of paragraph 5.12 is open to abuse by authorities, where they could claim that they don't have a shortfall, as City of Edinburgh have done in previous planning appeals. This was rejected at appeals and the City of Edinburgh LDP examination. Requirements of paragraph 5.12 are more onerous than requirements in equivalent SESplan SDP1 policy 7.

1st bullet - growth areas in spatial strategy are too constrained to meet Housing Supply Targets (HSTs) and do not encompass land which is sustainably located in terms of the City, other towns and transport corridors. The growth areas need to be extended in places, and the clause in paragraph 5.12 needs to be expressed more flexibly, in a similar manner to SESplan 1 Policy 7.

2nd bullet - strongly disagree as 5 year land supply should be calculated on all-tenure basis and no distinction should be drawn in respect to the tenure of sites needed to meet shortfalls. All tenure targets were required in the modified 2012 Glasgow and Clyde Valley SDP. The reporters recognised the importance of private sector housing meeting affordable needs along with other providers. The Reporters highlighted the need to maintain an all tenure five year effective land supply at all times. Findings identified that new housing provided in any sector can contribute to meeting that requirement (Issue 23 paragraph 2). The Reporter's recommended modification, accepted by Scottish Ministers, was to identify an all tenure housing requirement and that this overall housing requirement can be met by any housing tenure. For the same reasons, SESplan 2 should identify an all tenure housing supply target to allow the LDPs to make land available to meet the housing land requirement in full, regardless of the tenure of housing provided.

3rd bullet - needs to be caveated as in the City of Edinburgh LDP the reported concluded that there was shortfall in allocations amounting to approximately 7,000 homes over the plan period, but did not recommend the allocation of additional land. In these circumstances it may be appropriate to grant planning permission for large sites, where a significant proportion of the development is programmed beyond the 5-year period.

5th bullet - Delete as one purpose of the Green Belt and similar designations is to accommodate growth if required, and in many cases it represents the most sustainable location for development.

#### New Inghliston

Do not support de-allocation reference

#### North Berwick Community Council

Alignment with Countryside Around Towns policy and conservation area designations should be criteria in paragraph 5.12.

#### Park Lane (Scotland) Ltd.

Support 2nd sentence of 5.9. Identification of the green belt inner boundary should

take account of sustainable housing sites such as Ratho North. Proposed Plan should identify the need for a green belt and the LDP the precise form and boundaries of it.

Peebles Community Trust

Imbalance between housing land and social and physical infrastructure provision, particularly in small peripheral / rural settlements.

Roslin and Bilston Community Council

Consider that para 5.12 allows the LDP to be ignored.

Rural Renaissance

Scottish Borders allocations have been made in towns with little evidence of demand or marketability Effective sites are required. SESplan should require a detailed appraisal of sites to ensure effectiveness. This should be based on a rigorous assessment using an HLA with an agreed methodology and views of housebuilders. Sites should be removed from audit if over five years old. Include strategic policy on presumption in favour of sustainable development where allocated sites do not come forward and/or sites are deleted from the housing land audit.

SESplan should require a detailed reappraisal of allocations so that LDPs provide a strong base of sites that are demonstrably effective and able to deliver the 5 year land supply. The Housing Land Audit for each authority should be subject to robust scrutiny. This will result in sites being deleted from the audit if not demonstrably effective. Need a common set of measures for assessing effectiveness of housing sites. Housing Land Audit should be starting point, produced using an agreed methodology and set of assumptions; and take account of the views of housebuilders and Homes for Scotland. Paragraph 5.11 refers to the need for a step change in house building but does not explain adequately how this will be achieved. There should be a presumption in favour of sustainable development where allocated sites do not come forward and/or sites are deleted from the housing land audit.

Mr Julian Siann

No estimate of land area required in the housing background paper making it impossible to ascertain densities.

Scottish Property Federation

Question accuracy of supply figures used in tables 11.1 and 11.2 of Housing Background Paper that lead to land allocation conclusions in paragraphs 5.8 and 5.9 of the plan.

Scottish Wildlife Trust

5.12 Additional bullet: 'The proposal actively contributes to green networks and that this will be a material consideration in the planning process'

Shawfair LLP

SESplan Member Authorities have a shortfall in housing land supply. This was highlighted in the City of Edinburgh LDP Reporter's Findings. This is not address in

the Proposed Plan and requires action before approval.

Mr Charles Strang

Insufficient too merely 'give priority to Brownfield sites in the urban area': the LDP must ensure these sites are developed, with councils using compulsory purchase powers.

Taylor Wimpey and Hallam Land

Promoting development in Bilston as SESplan should focus development in marketable locations. Should not rely on sites which have demonstrated no substantive progress towards delivery

Wemyss & March Estate/Socially Conscious Capital

East Lothian only has a generous supply of land up to 2024. Post 2024 it is reliant on Blindwells, which is only aspirational. Expansion of the allocation at Longniddry South beyond 2024 will provide additional strategic scale housing development which will contribute to the effective housing land supply in accordance with the SESplan Spatial Strategy.

**Modifications sought by those submitting representations:**

Aithrie Estates

Paragraph 5.8, 1st sentence - add 'effective' after 'supply of' 5.8,  
Paragraph 5.8 2nd sentence - replace 'sufficed' with 'calculated excess of'.  
Paragraph 5.8 - additional sentence 'Nevertheless, the aim will be to capitalise on the resource represented by the established land supply, itself represented by historic pre-recession rates of housebuilding, in order to assist in the provision of infrastructure'.

Ashfield Land

The plan should also clearly acknowledge potential of accessible locations on the boundary of Edinburgh in order to identify a range of sites and alleviate any shortfall in housing land.

Barratt and David Wilson Homes, Lawfield Estate, WS Crawford

Para 5.8, 2nd sentence - subject to an agreed (with Homes for Scotland) breakdown of Land Supply Estimates (Table 11.1 & 11.2 of Housing Background Paper) in relation to contribution from Effective Land Supply, constrained sites and windfall sites in period 2018-30  
Paragraph 5.9, 1st sentence - Replace 'may' with 'will' □

Barratt and David Wilson Homes

Paragraph 5.12 - Delete Bullet point 2  
Paragraph 5.12 - Amend Bullet point 3 to, 'proposals must demonstrate that proposed housing can contribute to the immediate five year period'

Keith Bedborough

No modification is specified, representation indicates:  
Paragraph 5.12 - Modify final bullet point requiring binding commitment development to deliver infrastructure prior to development.

CALA Management Ltd

Paragraph 5.8 - Delete 2nd and 3rd sentences

Paragraph 5.10 - 2nd sentence - replace 'could' with 'would'

Paragraph 5.11 - Use methodology set out in Advice Box 1 of East Lothian Proposed LDP

Paragraph 5.12 - Delete 2nd bullet

Paragraph 5.12 - Delete 5th bullet

Cockburn Association

Insert stronger measures to direct development to brownfield.

Paragraph 5.12 - 5th & 6th bullets: Replace 'align' with 'conform'.

Edinburgh Association of Community Councils, Grange and Prestonfield Community Council

Paragraph 5.9, second sentence - Delete. Insert new sentence requiring exploration of what incentives or disincentives to ensure that brownfield land is developed first. Describe what regulatory/legislative changes are needed and press for these.

Gladman Scotland

Revise the emphasis on the sufficiency of the existing housing land supply in existing and emerging LDPs

Paragraph 5.8 - Delete non-emboldened text (and any consequential modifications required elsewhere be made to reflect this change)

Paragraph 5.11 - Additional sentence 'Any shortfall in delivery over the plan period to date should be added on to the housing supply target for the next five year period

Gullane Area Community Council

Paragraph 5.9 - Insert statement requiring any that unmet housing land requirement for the City of Edinburgh is met within the city.

Paragraph 5.12 - Modify to ensure that 'other designations' as referred to, include the Countryside Around Towns policy and also designated conservation area.

H&H Group Plc

Plan should direct development to sustainable, in demand locations.

No modification is specified, representation indicates:

5.10 Delete 3rd and 4th sentences and replace with statement that instead of deallocation sites should be re-identified as long term growth prospects out of 5 year phasing.

Haddington and District Amenity Society

Paragraph 5.10 - Modify to prevent windfall development in smaller towns and villages

Hallam Land Management Ltd. (037571)

Paragraph 5.12 - Modify to read "Where a shortfall in the five year effective land supply is identified, sites for greenfield housing development proposals may be

allocated in Local Development Plans or granted planning permission to maintain a five years effective housing land supply, subject to the following criteria:"

Hallam Land Management Ltd. (039805), Park Lane (Scotland) Ltd.

None requested but representation indicates...

5.9 Insert statement requiring inner green belt boundary review to take account of sustainable housing sites.

Homes for Scotland, Wallace Land Investment and Management

5.8, 2nd and 3rd sentence - delete.

Paragraph 5.11 - Modify as follows and add table ' They will maintain a five year effective housing land supply at all times measured against the all tenure five year housing supply targets. The five year effect housing land supply is calculated using the following methodology:

Step	Description	Method
A	Housing Supply Target for relevant plan period from Development Plan	
B	Housing Completions to date from Housing Land Audit	
C	Remaining Housing Supply Target for plan period	A - B
D	Annual Average Housing Supply Target over remaining plan period, where Y = number of years in plan period remaining	C / Y
E	<b>Five Year Housing Supply Target</b>	D x 5
F	<b>Five Year Effective Housing Land Supply from Housing Land Audit</b>	
	<b>Shortfall/Surplus in Five Year Effective Housing Land Supply</b>	E - F
	<b>Number of Years Supply</b>	(F / E) x 5
	<b>Percentage of Five Year Housing Supply Target Met</b>	(F / E) x 100

Paragraph 5.12 - Delete 2nd bullet and Paragraph should be amended to reflect an all-tenure approach.

Liberton and District Community Council

No modification suggested, representation suggests:

Paragraph 5.9 - Modify second sentence requiring that brownfield priority should not lead to need for replacement greenfield employment sites.

Paragraph 5.10 - Require that authorities will work with landowners and developers to bring sites forward before considering de-allocation.

Paragraph 5.12 - Additional first sentence setting out "When there is a shortfall in the five year supply, prior to consideration permitting additional housing land supply, planning authorities should require developers to advance developing effective sites in the 6-10 year supply to contribute to meeting any 5 year shortfall."

Mactaggart & Mickel Homes, Shawfair LLP, Shepherd Offshore (Scotland) Ltd

None suggested, representation indicates:

5.10 - insert additional sentence requiring full consideration of actions that could deliver sites before deallocating.

#### Midlothian Green Party

No modification is specified, representation indicates...

Paragraph 5.10 - Insert statement calling for councils to be given greater powers to enable de-allocation.

#### Moorfoot Community Council

Paragraph 5.12, 4th bullet - modify as follows "The scale, location and design of development must adhere to the placemaking principles...."

#### Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes

5.8, 1st sentence - modify to "Local Development Plans will allocate sufficient land which is capable of becoming effective to meet the Housing Land Requirements and deliver the housing supply targets over the 10 year period from the expected date of plan adoption"

5.8 - Delete 2nd and 3rd sentences.

5.9 - Delete 1st sentence.

5.9 - Modify 2nd sentence to: 'To meet any shortfall, all SESplan authorities will give priority to brownfield sites, with greenfield sites being allocated should there not be sufficient effective brownfield sites. All LDP allocations should be consistent with this Strategic Development Plan"

5.10 - Delete 2nd and 3rd sentences.

5.11 - Modify as follows "...through the Housing Land Audit. They will maintain a five year effective housing land supply at all times, within each Council area, measured against the five year housing supply targets. These are calculated by multiplying the annual average all-tenure housing supply targets (Table 5.1) by five, and fully accounting for any deficit or surplus in completions against the all-tenure housing supply target in previous years. Any deficits arising must be added to the 5-year all-tenure housing supply target to ensure that the whole target is achieved by the end of the plan period."

5.12, 1st sentence - Modify to "Where there is a shortfall in the five year effective land supply, as calculated by way of the methodology described in paragraph 5.11 above, proposals for additional housing will granted if they meet the following criteria':

5.12, 1st bullet - Modify to "Development is consistent with the spatial strategy of the development plan or, if outwith an identified growth area, should be well located in respect to community facilities and sustainable transport options."

5.12, 2nd bullet - Delete

5.12, 3rd bullet - Modify to "...will be completed in the next five years unless there is evidence of a longer term failure in the effective housing land supply'.

5.12, 5th bullet - Replace with "The development will be in keeping with the character of the settlement and local area, and should not result in significant harm to the natural environment or cultural heritage."

#### North Berwick Community Council

Paragraph 5.12 - Modify to ensure that 'other designations' as referred to, include

the Countryside Around Towns policy and also designated conservation area.

Peebles Community Trust

Paragraph 5.12 - additional bullet requiring development to accommodate / address the cumulative impact of housing allocations.

Roslin and Bilston Community Council

Replace para 5.12 to say that where it appears to a member authority that a shortfall in the 5 year effective land supply is likely to arise they will review their Local Development Plan as a matter of urgency.

Rural Renaissance

Require allocations in marketable areas and remove ineffective sites

Paragraph 5.10 - Additional sentence requiring that "Sites should not remain in the audit for more than 5 years without clear signs of activity."

Paragraph 5.10 - Additional sentence requiring "a presumption in favour of sustainable development where allocated sites do not come forward and/or sites are deleted from the housing land audit."

5.11 - Insert additional detail on how step change in house building will be achieved.

Scottish Wildlife Trust

5.12 Additional bullet: 'The proposal actively contributes to green networks and that this will be a material consideration in the planning process'

Mr Charles Strang

No modification suggested, representation suggests:

Paragraph 5.9 - Modify to Local Development Plan must ensure that brownfield sites in the urban area are developed before greenfield sites are considered

Wemyss & March Estate/Socially Conscious Capital

5.10 - Modify indicating that East Lothian will be required to allocate land to ensure a generous housing land requirement post 2024.

**Summary of responses (including reasons) by Planning Authority:**

**Paragraph 5.8**

Cala Management, Wallace Land Investment and Management, Wemyss & March Estate/Socially Conscious Capital, Homes for Scotland, Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes, Gladman Scotland

SEsplan does not accept any modifications to the second and third sentences of paragraph 5.8. The wording is compliant with SPP paragraph 118 (REF) which requires SDPs to "state the amount and broad locations of land which should be allocated in LDPs to meet the Housing Land Requirement (HLR) up to year 12 from the expected year of plan approval". Therefore it is SPP compliant to state that current land supply estimates (section 11 of Housing Background Paper) (REF) indicate that there is sufficient land supply to meet the HLRs for East Lothian, Fife, Midlothian, Scottish Borders and West Lothian up to 2030. This was signposted in the comparison of supply and need and demand for these areas in paragraph 4.11

and Table 4.4 of the Main Issues Report (REF).

The first sentence of paragraph 5.10 qualifies this by setting out that “for all SESplan authorities the level of housing land to be allocated will depend on the estimates of housing land at the time of LDP preparation”. Therefore the position in paragraph 5.8 is not fixed but depending on housing land supply which will change between SDP Proposed Plan and LDP preparation, including reductions through potential deallocations or moving sites to long term growth opportunities. **No Modification Proposed**

Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes

The first sentence of paragraph 5.8 is in full compliance with SPP paragraph 118 – “which should be allocated in LDPs to meet the HLR up to year 12 from the expected year of plan approval”. If there is not a sufficient supply of land then additional land will have to be allocated. Policy 5 of the SDP1 was approved (2013) prior to the current SPP (2014). **No Modification Proposed**

Barratt and David Wilson Homes, Lawfield Estate, WS Crawford, Scottish Property Federation

Accept that there is a calculation error in table 11.2 of the Housing Background Paper. The row B SESplan total should be ‘19,354’ not ‘20,354’. Subsequently the SESplan totals in rows H and J should be ‘104,658’ and ‘+34,420’ respectively. This would not change any of the statements in the plan as all authorities except City of Edinburgh currently have land supply estimates that indicate further allocations are not required to meet HLRs.

Do not accept the modification that the 2<sup>nd</sup> sentence has to be agreed with Homes for Scotland. The estimates of land supplies are based on Housing Land Audits and estimates of windfall used in LDP preparation. Housing Land Audits are agreed with Homes for Scotland and will be used to inform LDP preparation. **No Modification Proposed**

Rural Renaissance

Effectiveness of sites in the Scottish Borders is a matter for the Scottish Borders Council during preparation of the LDP as set out in SPP paragraph 117. **No Modification Proposed**

Aithrie Estates

Effective supply is not required to be demonstrated over ten years to meet HLRs. Justified windfall allowances can be included as set out in SPP paragraph 117. ‘Sufficient’ is clearer terminology than the suggested modification. Additional sentence modification is not required. The aim is to deliver the HSTs through a generous supply of land in the form of the HLRs being met through LDPs. **No Modification Proposed**

**Paragraph 5.9**

Barratt and David Wilson Homes, Cala Management, Lawfield Estate, WS Crawford, Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes

For the same reasons set out under paragraph 5.8, SESplan does not agree with reasoning for deleting or modifying the first sentence of paragraph 5.9. It is compliant with SPP paragraph 118 (REF). It does not set out the specific scale of the shortfall to the HLR as this will fluctuate between SDP Proposed Plan preparation and LDP preparation, by which point it could become a surplus. Therefore the word 'may' is more appropriate than the definitive 'will'. The numerical evidence for this sentence is set out in section 11 of the Housing Background Paper (REF). **No Modification Proposed**

Gullane Area Community Council

There is no mechanism in the plan for HLRs to be met in other local authority areas, therefore the suggested modification is not required. **No Modification Proposed**

Ashfield Land, Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes

The plan does not need to make reference to the need for peripheral or greenfield sites to be allocated or granted planning permission should there not be enough effective brownfield sites or a shortfall. This is the next step should there not be a sufficient supply of brownfield sites available to meet the HLR. As this paragraph relates to City of Edinburgh, it is not appropriate to refer to all authorities. This is covered under the Placemaking Principle (table 3.1) that "The re-use or re-development of brownfield land should be considered before new development takes place on greenfield land, including Prime Agricultural Land and other land important for food production." This applies to allocating land to meet HLRs if required. Brownfield land is not required to be effective at the time of plan preparation to meet the HLR. SPP paragraph 117 (REF) states "HLR can be met from a number of sources, most notably sites from the established supply which are effective or expected to become effective". For these reasons the proposed modification of the second sentence is not supported. **No Modification Proposed**

Ashfield Land, H&H Group Plc

The location of development sites in line with the Proposed Plan strategy is a consideration of multiple factors for LDPs, not just 'in demand' locations or sites on the Edinburgh boundary. They will be assessed through site selection process factoring in paragraph 5.9, the placemaking principles, Strategic Environmental Assessment and other requirements of the SDP. **No Modification Proposed**

Hallam Land Management (039805), Park Lane (Scotland)

The SDP sets out the broad location of Green Belts. Exact boundaries are a matter for LPDs. There is no indication that a Green Belt review is required in Edinburgh at this stage based on the requirements of meeting the HLR. **No Modification Proposed**

Cockburn Association, Edinburgh Association of Community Councils, Grange and Prestonfield Community Council, Mr Charles Strang, Liberton and District Community Council

SESplan refers to its reasoning set out in Issue 2.3 Schedule 4.

Requiring brownfield land to be developed before greenfield land is developed is not possible when greenfield sites have already been allocated and permitted for development to meet requirements of the strategy. The wording in the second sentence of paragraph 5.9 is considered in compliance with SPP, the strategy and the placemaking principles.

Other than the strategy, which locates development in and around settlements with brownfield land, and the brownfield priority set out in the plan, it is not appropriate for SESplan to set out any other incentives for brownfield development.

The existing employment use and level of occupancy of brownfield employment sites will be considered when assessing sites.

**No Modification Proposed**

### **Paragraph 5.10 and De-allocation**

Haddington and District Amenity Society, CALA Management Ltd

Paragraph 117 of SPP (REF) states that windfall evidenced allowances can be used to meet the HLR. This will be a decision for authorities during LDP preparation. The assessment of windfall housing proposals is a matter for East Lothian Council. **No Modification Proposed**

Cockburn Association

HST can be contributed towards through net additional dwellings returned to use from vacant occupancy as well as new build development. Consideration of this is set out in paragraphs 10.2 and 10.3 of the Housing Background Paper which states that 'whilst each authority is seeking a net reduction in vacant homes, there is no robust data yet available to indicate that this would be significant'. The matter will be more appropriately addressed in Local Housing Strategies and local authority vacant housing programmes. **No Modification Proposed**

Mactaggart & Mickel Homes, Shawfair LLP, Shepherd Offshore (Scotland) Ltd, H&H Group Plc, Murray Estates, New Ingliston, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes

The need for de-allocation of sites that remain ineffective despite multiple actions to make them deliverable was identified in page 127 of the Planning for Infrastructure Research Project: Final Report (REF) and in paragraph 76 of the subsequent Draft Planning Delivery Advice: Housing and Infrastructure (REF). The current wording of paragraph 5.10 gives assurance that it would only be used where action taken has proved ineffective. The alternative would also be to reclassify allocated sites as long term growth opportunities for future plan periods. An excessive level of land supply where action has proved ineffective does not provide certainty to communities, authorities or infrastructure providers and therefore de-allocation should be considered as a potential action. **No Modification Proposed.**

Midlothian Green Party

Increased powers are not required at this stage. Councils can de-allocate land through the LDP preparation process. **No Modification Proposed**

### Rural Renaissance

Guidance on Housing Land Audits does not require sites to be removed if over five years old. Sites over this age can deliver housing into the plan period. Paragraphs 5.11 and 5.12 set out the approach to where there is a shortfall in effective housing land supplies therefore an additional strategic policy is not required. **No**

### **Modification Proposed**

### Gladman Scotland

Paragraph 5.10 is not inconsistent with paragraph 5.8. Table 5.11 of the Housing Background Paper indicates that authorities apart from City of Edinburgh have significant surplus housing land compared to Housing Land Requirements as well as some constrained sites that may not become effective. This could allow authorities to consider de-allocating sites. Authorities also may choose to de-allocate sites and then allocate new sites to meet HLRs. **No Modification**

### **Proposed**

Support for de-allocation reference in paragraph 5.10 was also received from two organisations not set out in the Schedule.

### **Paragraph 5.11**

Cala Management, Gladman Scotland Homes for Scotland, Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes, Wallace Land Investment and Management

The approach required by the proposed modifications has not worked in practice. It requires additional land supply when delivery failure has been due to changes in demand or other non-land supply related reasons. There have not been shortfalls in land supplies, only shortfalls in delivery over initial parts of plan period. This has been particularly apparent in a post credit crunch and post-recession environment. This results in additional housing land supply creating further uncertainty for communities, authorities and infrastructure providers. Impacts of oversupplies of land are set out in the SESplan response to Issue 8. If there is always a five year effective land supply, then shortfalls in delivery against HSTs will not be due to the effectiveness of land supply.

Gladman reference to SPP paragraph 118 is misplaced as this statement refers to the HLRs being met in full when LDPs are prepared and is not a five year effective supply matter.

Representations state that their suggested approach is the only approach accepted. This is not correct as demonstrated in the adopted Scottish Borders LDP Appendix 2 Section B (REF). That approach allows previous levels of delivery to inform the 5 year effective land supply target not only the housing requirements of SDP1 and the Housing Land Supplementary Guidance. The Scottish Government does not currently set out a specific approach to setting five year supply targets. The matter is being considered by Scottish Government and others at present and will also be considered as part of the planning review. An approach was considered in the Draft Planning and Delivery Advice: Housing and Infrastructure and the Scottish Government has indicated that that work will proceed once the review consultation has concluded. **No Modification Proposed**

### Rural Renaissance

Part of the step change will be achieved through the increase in scale of affordable housing programmes of Local Authorities and Registered Social Landlords though increased funding. How housing sites will be delivered is more appropriate for action programmes. **No Modification Proposed**

### **Paragraph 5.12**

Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes

As it is authorities who prepare housing land audits, in agreement with Homes for Scotland, they are the most appropriate organisations to then determine if there is a shortfall of effective supply. **No Modification Proposed**

### Hallam Land Management (037571)

The criteria in paragraph 5.12 should apply to assessing all housing development proposals when there is a shortfall in five year effective supply, not only greenfield proposals. The priority for brownfield sites (paragraph 5.9 and Table 3.1) applies when assessing proposals for allocation during LDP preparation. **No Modification Proposed**

### Liberton and District Community Council

Housing Land Audits will consider phasing of sites but authorities cannot bring forward land for development unless they are the developer or the landowner. **No Modification Proposed**

### Roslin and Bilston Community Council

Reviews of LDPs are a lengthy process and are therefore not appropriate to mitigate shortfalls in 5 year effective land supplies. The approach in the Proposed Plan is compliant with SPP. **No Modification Proposed**

### Cockburn Association

The impacts of 'Brexit' cannot be estimated at this stage. SPP requires that planning authorities should maintain a 5-year effective land supply. **No Modification Proposed**

### **5.12 Bullet 1**

Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes

It would not be appropriate to grant permission for housing sites that are not consistent with the broad strategy of the SDP solely due to a shortfall in effective housing supply. Doing so would conflict with the vision of the SDP and potentially have negative impacts on environmental objectives. **No Modification Proposed**

### **5.12 Bullet 2**

Barratt & David Wilson Homes, Cala Management, Homes for Scotland, Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes.

The reasoning for setting separate HSTs and not taking an all tenure approach to HSTs is set out in the Issue 8 Increasing Housing Delivery Schedule 4. The Glasgow Clyde Valley SDP referred to, was approved under a different SPP to the

current 2014 SPP. The previous SPP did not require separate affordable and market HSTs.

Establishing the adequacy of the 5 year effective land supply is a comparison against housing supply targets and this has to be tenure specific as required by SPP paragraph 115. Where there is a shortfall in affordable housing, it cannot be met by market housing (or vice versa). This is recognised in SPP paragraph 115 as that is the purpose of the separate HSTs. Doing so would mask the need to deliver affordable or market housing. Therefore the proportion of affordable and market housing in the development must reflect the tenure and scale of the shortfall identified.

The 2<sup>nd</sup> criteria requires that the scale of the proposal must also reflect the scale of the shortfall. It would not be appropriate to grant permission solely on the basis of five year effective supply shortfalls for large scale proposals (e.g. 1,000 dwellings) when the scale of the shortfall is small (e.g. 100 dwellings). Similarly it would not be appropriate to consent small scale proposals purely for five year land supply reasons when the scale of the shortfall is significantly larger as the proposal would not contribute significantly to meeting the shortfall.

### **5.12 Bullet 3**

Barratt & David Wilson Homes, Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes

'Significant' is used rather than setting a defined percentage which would not allow for discretionary and flexible use. The criterion is required as it would not be appropriate to grant consent for a large housing proposal when only a small proportion would be delivered in the five year period. It would not fulfil the original purpose of being considered for development, namely to reduce the shortfall in five year supply, only to increase the supply in year five onwards. **No Modification Proposed**

### **5.12 Bullets 4, 5, 6 and 7**

CALA Management Ltd

Green networks, including forthcoming Cross Boundary Green Networks Supplementary Guidance, are a relevant consideration when additional development may need to be permitted to meet land supply shortfalls. They are referred in paragraph 29 of SPP, which sets out guiding principles when considering whether development contributes towards sustainable development. Unsustainable development proposals should not be permitted. **No Modification Proposed**

Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes

The representations refer to the 5<sup>th</sup> bullet (which covers green networks) but then refers to green belt . This response assumes there is a typo in the representations and that the 6<sup>th</sup> bullet is what they are referring to. The inclusion of green belts as a consideration accords with the current SDP1 policy 7 that 'development will not undermine green belt objectives'. SESplan disagrees that green belt is often the most suitable location for development. Green belt locations are often peripheral and have poor accessibility.

Non-LDP planned development in these locations can often lead to the sprawl of large built up areas, coalescence of settlements, negative impacts on the character and setting of towns and can discourage urban regeneration.

Other similar designations are also considered relevant as the setting, regeneration and the spread of development is a consideration for all settlements, not just those with green belts. **No Modification Proposed**

Mr Keith Bedborough

Delivery infrastructure prior to development is not always an efficient use of resources. Infrastructure should be delivered alongside development or when required by the development. The current wording of the 7<sup>th</sup> bullet point is considered sufficient. **No Modification Proposed**

Moorfoot Community Council

SESplan considers existing wording is sufficient for the criteria to be used. **No Modification Proposed**

Cockburn Association

SESplan considers existing wording is sufficient for the criteria to be used. **No Modification Proposed**

Gullane Area Community Council, North Berwick Community Council

Countryside around Towns designations do fulfil similar functions to Green Belt and does not need to be specifically listed. However, conservation Areas do not but proposals will need to take account of the placemaking principles. They cover character and historic environment of places. **No Modification Proposed**

## **5.12 Additional Bullets**

Peebles Community Trust

7<sup>th</sup> bullet point addresses the need for infrastructure and covers all types of infrastructure required, including through the cumulative impacts from development. **No Modification Proposed**

Scottish Wildlife Trust

Green networks are adequately addressed through the 5<sup>th</sup> bullet. **No Modification Proposed**

## **Other Matters**

Julian Siann

The area of land required is not set out in Housing Background Paper because it is dependant on land supplies at the time of LDP preparation. The SDP provides outline guidance on the use of densities in the Placemaking Principles and Supporting Non-Car Travel sections. **No Modification Proposed**

Cala Management, Shawfair LLP

Shortfalls to the current SDP are an LDP and member authority matter and are therefore not required to be addressed in the Proposed Plan. The Annual Housing Updates set out the latest SESplan land supply positions with respect to the current

SDP. The Housing Land Requirements in the current SDP and the Housing Land Supplementary Guidance will be superceded and no longer in effect when the HSTs and HLRs in the Proposed Plan are adopted in 2018. **No Modification Proposed**

Support was received for paragraph 5.12 from five representees.

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]

<b>Issue 10</b>	<b>Affordable and Specialist Housing</b>	
<b>Development Plan reference:</b>	Page 45 paragraphs 5.5 – 5.7	<b>Reporter:</b> [Note: For DPEA use only.]
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Mr George Adam (037603)  Aithrie Estates (032643)  Cockburn Association (037249)  Dunbar Community Council (790195)  Edinburgh Association of Community Councils (040476)  Grange and Prestonfield Community Council (790304)  H&amp;H Group Plc (927998)  Haddington and District Amenity Society (803807)  Hallam Land Management Limited (039805)  Homes for Scotland (040551)  Mrs Susan Hunter (039853)  Liberton and District Community Council (790396)  Mactaggart and Mickel Homes (038949)  McCarthy and Stone Retirement Lifestyles Limited (852061)  Midlothian Green Party (778339)  Midlothian Health and Care Integration Joint Board (040241)  Moorfoot Community Council (906008)</p>	<p>Mrs Mirabelle Maslin (928549)  Murray Estates (930087)  New Ingliston Limited (929755)  NHS Lothian Public Health and Health Policy (840024)  North Berwick Community Council (035522)  Park Lane (Scotland) Limited (039990)  Persimmon Homes (040349)  Roslin and Bilston Community Council (790524)  Rural Renaissance (039402)  Shawfair LLP (039940)  Shepherd Offshore (Scotland) Limited (038954)  South West Communities Forum (805601)  Stewart Milne Homes (930082)  Taylor Wimpey and Barratt Homes (040609)  Wallace Land Investment and Management (930071)  Wemyss and March Estate/Socially Conscious Capital (037270)</p>	
<b>Provision of the Development Plan to which the issue relates:</b>	Delivery of affordable, specialist and other needs in housing.	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Mr George Adam</u>  The term 'affordable housing' is not clear if this includes social housing (council or private rented housing).</p> <p><u>Aithrie Estates</u>  The requirement for LDPs to set the proportion of affordable housing is irrelevant as it will only apply to new land and as there are no consents or allocations proposed in the Proposed Plan it can only apply to post 2030 land.</p>		

Cockburn Association

Concerned about deliverability of affordable housing. Welcome reference in paragraph 5.5 to 'an ambitious affordable housing programme' however, the proportion of affordable housing or the means of achieving it is not specified.

LDPs should have the flexibility to vary the affordable housing requirement significantly above 25% where justified.

The procedures for implementing the affordable housing requirement on development sites should be tightened up to ensure that specified targets are met by developers. Section 75 agreements are frequently set aside. Highlights need for increased investment in order to provide sufficient amounts of affordable housing.

Dunbar Community Council

Do not consider that mixing affordable with market housing works and results in ghettos. More imaginative solutions are needed. People in affordable housing often do not own a car and location of affordable housing in new developments on the edge of settlements does not serve their needs. Brownfield sites in town centres could be used.

Edinburgh Association of Community Councils, Grange and Prestonfield Community Council

Setting a proportion of affordable sites within market sites cannot achieve anywhere near what is required without an unrealistic distortion of the market. The Proposed Plan does not adequately address the issue that investment needed to meet affordable/social demand is beyond that which is available.

H&H Group Plc

Support the ambitious targets for affordable housing however appropriate detail is lacking on how the targets will be achieved and the proportional expectations on public and private sector delivery. There is a need for consistency and a need to deliver significant growth across all housing tenures. Need to be more clear on the overall financial viability of a development when applying affordable housing targets and related contributions.

The current 25% level is acceptable however moving above this level will require clear justification having regard to development economics.

The Proposed Plan is vague on what affordable means and how and when it should be applied. Greater detail should be provided on implementation.

Haddington and District Amenity Society

Substantial need for affordable housing in East Lothian and in rural communities.

Hallam Land Management Ltd.

The plan lacks definition of making best use of the public estate and lacks quantification of the need for specialist housing.

Homes for Scotland

The direction that LDPs will set out the proportion of affordable housing sought on

market sites should be clarified to ensure that this proportion shall be generally no more than 25% of the total number of houses as set out in SPP.

Mrs Susan Hunter

Need for greater delineation of the housing need. Fife needs truly affordable housing in order to sustain communities affected by unemployment.

Liberton and District Community Council

Supports policy on specialist housing but consider use of local factors in setting affordable housing proportion on market sites must be explained. If housing need is 60% affordable / 40% market, then the sites allocated in the LDPs should only allow the market to build 40% of any site for owner occupation and private rent.

Mactaggart & Mickel Homes, Shawfair LLP, Shepherd Offshore (Scotland) Ltd

The Proposed Plan is overly cautious and negative in its approach to the provision of affordable housing. This is damaging to the aims and vision of the Proposed Plan. The Proposed Plan requires to be amended as it fails to accord with national policy. It does not address the shortfall in the provision of affordable homes. The shortfall in ambition is based on existing scenarios in respect of funding positions and takes no cognisance of the flexibility several LDPs offer in respect of bringing affordable housing forward and working with developers to ensure needs are met. Statistical trends are more buoyant than the Background paper indicates.

McCarthy and Stone Retirement Lifestyles Ltd

Commend the positive wording relating to delivery of specialist housing. The Proposed Plan could have gone further, for example, by providing annualised targets for delivery but recognise the high level strategic nature of the document. Commended emphasis on requirement for constituent authorities to plan for the delivery of specialist forms of accommodation.

Midlothian Green Party

Mention of affordable housing at paragraph 5.5 (page 45) is fleeting. Can the required amount of affordable housing can be delivered?

Midlothian Health and Care Integration Joint Board, NHS Lothian Public Health and Health Policy

Integration Joint Boards should be consulted as part of the LDP process relating to Affordable Housing. Housing Contribution Statements will be important for helping Local Housing Strategies and LDP enable the types of homes that will address the needs of a growing, ageing population and the growth in the number of smaller households.

Moorfoot Community Council

No attention in Proposed Plan to deliver greater numbers of social (instead of private) housing.

Mrs Mirabelle Maslin

Paragraph 5.6 weak and imprecise. Essential Proposed Plan embodies an understanding of the needs of the Adult Health and Social Care Policy and at the very least require all new houses to be designed in accordance with the principles

of avoiding stair hazards and facilitating ground floor living by people who require care at home.

Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes

Support LDPs setting out the proportion of affordable housing that will be sought on market sites. For full compliance with SPP, it should state that it should generally be no more than 25%.

New Ingliston Ltd

The direction that LDPs will set out the proportion of affordable housing sought on market sites should be clarified to ensure that this proportion shall be generally no more than 25% of the total number of houses as set out in SPP.

North Berwick Community Council

Welcome any moves to strengthen local planning to ensure that new developments include a range of housing including affordable housing that allows for people's changing needs.

Park Lane (Scotland) Ltd.

Consider that the Proposed Plan lacks definition of affordable housing and making best use of the public estate and lacks quantification of the need for specialist housing.

Roslin and Bilston Community Council

Consider that paragraph 5.6 needs to be expressed more clearly. Developer should be required to provide specific standards of housing and energy efficiency.

Rural Renaissance

The LDP should set an affordable housing threshold, capped at 25%. Unlikely that any single threshold will be applicable across the whole LDP area and localised thresholds should be identified. Affordable housing thresholds must be backed by evidence of need from a locally based housing needs survey not by evidence of demand for product.

Should recognise lack of grant funding means the full affordable housing requirement is unlikely to be met. Reference mechanisms in PAN 2/2010. Include reference for use of commuted sums at a realistic level. This will overcome the problem of grant funding and allow delivery of affordable housing through a fund.

South West Communities Forum

If affordable housing is to be provided as stated, government must fund the infrastructure and apply strong incentives for redevelopment of brownfield land.

Wallace Land Investment & Management

The approach of allowing LDPs to set the proportion of affordable housing that will be sought on market sites complies with SPP and that the plan should include that the affordable housing requirement should be no more than 25% in line with SPP.

Wemyss & March Estate/Socially Conscious Capital

SDP should set out maximum 25% affordable housing on market sites. More housing that is affordable will be delivered through a generous and effective supply of land with reduced land prices.

**Modifications sought by those submitting representations:**

Aithrie Estates

At 5.5 delete text in bold or replace with an acknowledgement that going beyond the accepted rates of 20% and 25% is unlikely to be relevant before 2030 unless further development land is added prior to that date. (p45, para 5.5)

Cockburn Association

Allow LDPs to have the flexibility to increase the affordable housing requirement. Provide stronger enforcement to ensure that specified targets on affordable housing requirements are met by developers.

Edinburgh Association of Community Councils, Grange and Prestonfield Community Council

Revise the Proposed Plan to adequately address mismatch between demand for affordable housing and investment needed.

H&H Group Plc

Provide greater detail on implementation of affordable housing requirement (p5, para 45).

Haddington and District Amenity Society

Paragraph 5.4 - Insert statement setting out robust approach to affordable housing delivery.

Hallam Land Management Ltd.

Representation indicates, the Proposed Plan should include explanation of what is meant by making the best use of the public estate and the need for specialist housing should be quantified. (p 45, para 5.5)

Homes for Scotland

Amend text in bold at para 5.5 (section in bold) to state: 'Local Development Plans will set out the proportion of affordable housing that will be sought on market sites, taking into account relevant local factors. This will be no more than 25%. Affordable housing will also be developed by housing associations and councils, making best use of the public estate' (P45, para 5.5).

Liberton and District Community Council

5.5 Modify to require proportion of affordable housing to be sought on market sites to be the same as proportion of overall affordable need.

Mactaggart & Mickel Homes, Shawfair LLP, Shepherd Offshore (Scotland) Ltd

Revise the affordable housing supply target. (p 43, Table 5.1)

Midlothian Health and Care Integration Joint Board, NHS Lothian Public Health and

#### Health Policy

Require Integration Joint Boards, supported by Health and Social Care Partnerships, to be consulted as part of the local development planning process relating to Affordable Housing.

#### Mrs Mirabelle Maslin

Require all new houses to be designed in accordance with the principles of avoiding stair hazards and facilitating ground floor living by people who require care at home.

#### Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes

5.5, 3rd sentence - modify as follows "...will be sought on market sites but this should generally be no more than 25%"

#### New Ingliston Ltd

Provide further clarity regarding the requirement for affordable housing and avoid wording which suggests 'minimum of' (p 45, para 5.5) 5.5 - modify to ensure that proportion sought will be generally no more than 25% of the total number of houses.

#### North Berwick Community Council

Include recognition of issues around the supply of affordable and specialist housing in North Berwick area. Strengthen local planning to ensure that new developments include a range of housing types including affordable housing. Keep under review issue of second or holiday homes and if necessary include initiatives to discourage this.

#### Park Lane (Scotland) Ltd.

Representation indicates, the Proposed Plan should include definition of affordable housing and explanation of what is meant by making the best use of the public estate and the need for specialist housing should be quantified. (p 45, para 5.5)

#### Roslin and Bilston Community Council

Reword para 5.6 to provide clarity on the way that homes can be provided to meet the needs of the population.

#### Rural Renaissance

Indicates, allow LDPs to set benchmark for affordable housing within 25% cap.

Make clear that provision of affordable housing using any of the mechanisms set out in PAN 2/2010 are acceptable.

Recognise that full requirement for affordable housing is unlikely to be met by RSLs.

Distinguish between affordable housing needs and wants e.g. midmarket rent.

Allow use of commuted sums.

#### Wallace Land Investment & Management

5.5: Amend para 5.5 to read: "Local Development Plans will set out the proportion of affordable housing that will be sought on market sites, taking into account relevant local factors and will be no more than 25%. Affordable housing will also be developed by housing associations and councils, making best use of the public estate." (p45, para 5.5)

#### Wemyss & March Estate/Socially Conscious Capital

5.5 - Insert maximum of 25% affordable housing

### **Summary of responses (including reasons) by Planning Authority:**

#### **Proportion of Affordable Housing on Market Sites**

Cockburn Association, Aithrie Estates, H&H Group Plc, Homes for Scotland, Liberton and District Community Council, Midlothian Green Party, Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes, New Ingliston Ltd, Rural Renaissance, Wallace Land Investment & Management, Wemyss & March Estate/Socially Conscious Capital

Scottish Planning Policy paragraph 129 states that planning authorities should consider the level of affordable housing contribution which is deliverable and viable and that the amount required as a contribution should generally be no more than 25%.

The Proposed Plan takes account of these factors in paragraph 5.5 by stating that it will be the role of LDPs to set out the proportion of affordable housing on market sites taking account of relevant local factors. This gives local authorities and LDPs the necessary flexibility to take account of the specific market factors, site specific considerations and the level of affordable need in their area. It is not considered relevant to restate the principal that affordable housing on market sites will 'generally be no more the 25%' when this is qualified in SPP. In addition, it is not considered necessary for the Proposed Plan to define the 'relevant local factors' as these may vary between authorities.

The role of the SDP will be to inform subsequent LDPs and as such it will influence allocations within the plan period. **No modification proposed.**

#### **Funding and Delivery**

Cockburn Association, Edinburgh Association of Community Councils, Grange and Prestonfield Community Council, H&H Group Plc, Haddington and District Amenity Society, Mrs Susan Hunter, Mactaggart & Mickel Homes, McCarthy and Stone Retirement Lifestyles Ltd, Shawfair LLP, Shepherd Offshore (Scotland) Ltd, South West Communities Forum, Rural Renaissance

As set out in the Housing Background Paper (REF) it is recognised that funding for the delivery of affordable housing is a constraint. Funding can come from a number of sources both local and national and is not limited to delivery only as part of market sites. The Proposed Plan does not detail each funding mechanism as these vary across local authorities and it would not be appropriate for the SDP to set this. Details of delivery will be set out by local authorities in LDPs, accompanying Action Programmes and in legal agreements negotiated on a site by site basis. Whilst it is noted that the Government may have a role in the provision

of funding and/or infrastructure for affordable housing requiring this provision is outside the scope of the SDP. **No modifications proposed.**

#### Haddington and District Amenity Society

The need for affordable housing in each of the SESplan member authorities is set out in the HNDA (REF). Issue 8 Increasing Housing Delivery deals with how this is dealt with in relation to Housing Supply Targets. **No modification proposed.**

#### **Affordable and Market Housing Mix**

##### Dunbar Community Council, North Berwick Community Council

In SPP paragraphs 39-40, it is stated that a design led approach should be applied at all plan levels and that the six qualities of successful place should be supported. Under the 'Adaptable' quality, paragraph 44, development is required to have a mix of tenures and typologies. These qualities are reflected in the Placemaking Principles of the Proposed Plan (pages 16-17). The integration of affordable with market housing is considered to be a direct result of this direction enabling more sustainable communities and places. It is not considered that this integration results in affordable housing in unsuitable locations, as new development in the region is directed to brownfield sites and locations which have good public transport access in accordance with the principles of the Proposed Plan's Spatial Strategy. **No modification proposed.**

#### **Affordable Definition**

##### Mr George Adam, H&H Group Plc, Park Lane (Scotland) Ltd., Moorfoot Community Council, Mrs Susan Hunter

Affordable housing is defined in Scottish Planning Policy paragraph 126. Reference to affordable housing in the Proposed Plan follows this definition. It is not considered that it is necessary to restate this or appropriate to redefine the definition for the SDP. Delivery of social housing falls under the definition of affordable housing but it is not considered appropriate to define between types of affordable housing at SDP level. Further definition of affordable housing is also included in the HNDA (REF). **No modification proposed.**

#### **Specialist Housing**

##### Hallam Land Management Ltd.

Whilst the plan, in paragraph 5.6, does not specify figures for specialist housing need the HNDA (REF) sets out that the region has a 62% projected increase in the number of older households and that 31% of households have at least one member with a long term illness or disability. It also presents information on changing household sizes. The plan directs member authorities to take account of these existing or changing factors, as relevant to their areas, to ensure the needs of the population are met in relation to the provision of homes. It is not considered further detail is required in the Plan. **No modification proposed.**

##### Mrs Mirabelle Maslin, Roslin and Bilston Community Council

It is recognised that specific design features of homes play a role in ensuring housing meets the needs of older people and others with specialised needs. Similarly, that energy efficiency can contribute to affordability. However, design detail is better placed for consideration in Local Development Plans, Development Management and the provisions of Building Standards. **No modification**

**proposed.**

**Public Estate**

Hallam Land Management Ltd., Park Lane (Scotland) Ltd.

Paragraph 5.5, in referencing 'public estate', refers to land in the ownership of local authorities and the potential opportunities for development of affordable housing on such sites as this may be a cost effective method of development in relation to land values. The use and amount of public estate varies between local authorities. **No modification proposed.**

**Shortfall in Affordable Housing**

Mactaggart & Mickel Homes, Shawfair LLP, Shepherd Offshore (Scotland) Ltd

Issues of addressing the shortfall in affordable housing are covered under Issue 8 Increasing Housing Delivery. **No modification proposed.**

**Integration Joint Boards**

Midlothian Health and Care Integration Joint Board, NHS Lothian Public Health and Health Policy

Noted. This is an issue for member authorities. **No modification proposed.**

South West Communities Forum

Brownfield land use is set out in the Placemaking Principles Table 3.1. **No modification proposed.**

18 representations supporting this section of the Proposed Plan are also noted.

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]

<b>Issue 11</b>	<b>Thriving Town Centres</b>	
<b>Development Plan reference:</b>	<b>Thriving Town Centres, page 49, para 5.14-5.16 and table 5.4</b>	<b>Reporter: [Note: For DPEA use only.]</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Cockburn Association (037249) Edinburgh Association of Community Councils(040476) Eskbank & Newbattle Community Council (891202) Haddington and District Amenity Society (803807) Liberton and District Community Council (790396) Midlothian Green Party (778339) Mrs Mirabelle Maslin (928549)	Peebles Community Trust (810911) Police Scotland (0400584) Roslin and Bilston Community Council (790524) Sportscotland (029346) TH Real Estate (035989) The John Lewis Partnership (039926) VisitScotland (029385)	
<b>Provision of the Development Plan to which the issue relates:</b>	Town centres	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Cockburn Association (037249)</u>  Support the Town Centre proposals. It is important to emphasise the provision of good public transport facilities and adequate car parking, incorporating generous tree / shrub planting.</p> <p>Care needs to be taken to ensure that the sequential approach does not result in large developments in edge of centre sites impacting on viability of local shops and loss or damage of areas of green space.</p> <p>It is helpful that Local Development Plans (LDPs) will be directed to identify a network of other town and commercial centres. Welcome encouragement of an evening economy but should not encourage a night economy.</p> <p><u>Edinburgh Association of Community Councils (040476)</u>  Support paragraph 5.15 but this must be backed up by a public transport network that encourages footfall without additional car use and policing and security systems that support local residents, reducing anti-social behaviour.</p> <p>At 5.16 it should be recognised that not all Town Centres may prosper through retail and other commercial uses and early intervention before blight sets in to re-</p>		

designate areas for housing or mixed use should be encouraged.

Eskbank & Newbattle Community Council (891202)

Strongly support the prioritisation of commercial, leisure and cultural developments in town centres and edge of town locations over out-of-town retail centres.

Haddington and District Amenity Society (803807)

Out of centre development damages centres of small towns and villages.

Liberton and District Community Council (790396)

Support policy at Para 5.15 but consider that this has implications for residents in the centres hinterland. Policy at Para 5.16 must make provision for controls to ensure increased activities in town centres do not impinge on local residents and those in the suburbs who could lose out on policing due to town / centre requirements.

Midlothian Green Party (778339)

Welcomes the support for town centres but expresses difficulty in seeing how they can compete with expanding out of town centres.

Mrs Mirabelle Maslin (928549)

Town centres have been allowed to degenerate. A contributing factor is the preferential development of retail parks. There is nothing in the Proposed Plan that will ensure that regeneration of town centres takes priority over expanding retail parks

Peebles Community Trust (810911)

Supportive of guidelines and particularly town centre first policy as they are applied to peripheral / rural settlements. This is of even more importance where conservation of Victorian (heritage) town centres is used as the rationale for edge of centre development rather than better integrating such development.

Police Scotland (0400584)

The expansion of the night time economy may cause an increase in criminality and Police Scotland Fife Division would require to consider an increase in capacity to deal with higher footfall in these areas.

Roslin and Bilston Community Council (790524)

Town centres have been allowed to degenerate. A contributing factor is the preferential development of retail parks. There is nothing in the Proposed Plan that will ensure that regeneration of town centres takes priority over expanding retail parks. Out-of-town-centre hubs do not provide the accessible facilities residents need.

Sportscotland (029346)

Generally support the town centre first approach however consider that for some uses, such as sports facilities and schools, a town centre location may not always be the most appropriate location. A blanket sequential approach in LDPs on all such development may have unintended consequences.

TH Real Estate (035989)

Supports the identification and strategic role of Thriving Town Centres.

Support the Proposed Plan setting out an overarching policy framework at a strategic level for the determination of application proposals. This will help ensure proposals with cross boundary impacts can be comprehensively considered.

The Proposed Plan should be more explicit in its support for the City Centre at the top of the hierarchy of centres to maintain its importance to the wider City Region. The current wording in the Proposed Plan has weakened the stance in the current Strategic Development Plan (SDP) that placed the city centre at the top of the hierarchy. Specific reference to the St James project should be made to further support investor confidence within the City Centre.

The John Lewis Partnership (039926)

Supportive of vision that Edinburgh should remain the focus for the regions retail and leisure offer. The Proposed Plan should provide strong encouragement to potential investment in the city centre. Should ensure proposals for new retail floor space in out of town locations are restricted where the city centre is not meeting its own targets for the delivery of new floorspace set out in Edinburgh's retail assessment. The Proposed Plan should continue to champion a strong town centre first approach as this is vital to ensuring the right conditions for city centre investment.

Supportive of aspiration to support all town centre uses, not just retail, in the town centre.

Consider that the identification of a specific role of each centre will provide clarity over the nature of retail and other development appropriate in these locations.

VisitScotland (029385)

Tourism is one of the key economic drivers for growth. It is a more specific function than leisure and should be identified separately as a function for city, town and strategic centres.

**Modifications sought by those submitting representations:**

Cockburn Association (1037249)

Remove "night" from the last sentence of para 5.15.

Add to para 5.16 " but not if it puts at risk the viability of the existing local shops or removes open space from the community."

Edinburgh Association of Community Councils (040476)

Paragraph 5.16 should recognise that not all Town Centres may prosper through retail and other commercial uses and early intervention to re-designate areas for housing or mixed use should be encouraged.

Haddington and District Amenity Society (803807)

At paragraph 5.16 - prevent out of centre development in smaller towns and villages

Roslin and Bilston Community Council (790524)

Express within the Proposed Plan the protection of town centres before retail parks.

Express within the Proposed Plan the need for accessible facilities within town centres.

Sportscotland (029346)

Provide a caveat at 5.16. Suggest: "While SPP outlines a town centre first approach, it is recognised that community and educational facilities should be easily accessible to the communities they serve. Local Development Plans should allow a degree of flexibility to allow the most appropriate siting."(p49, para 5.16)

TH Real Estate (035989)

Amend bullet points at 5.16 to identify the City Centre as a preferred location before strategic or local centres. (p49, para 5.16)

Include within supporting text of Thriving Town Centres reference to the St James project. (p49)

The John Lewis Partnership (039926)

Proposed Plan should provide strong encouragement to potential developers to invest in sites that will accelerate the regeneration of the city centre and broaden the choice on offer.

Proposed Plan should ensure that development proposals for new retail development do not seek to compete with the city centre, reduce its attractiveness or its ability to draw in customers from the wider city boundaries. Any development out with the city centre should be seen to support the city centre and complement the services that it offers.

VisitScotland (029385)

At Table 5.4 include tourism as a function for the City Centre, Strategic Centres and Town Centres.(p49, Table 5.4).

**Summary of responses (including reasons) by Planning Authority:**

Cockburn Association (1037249)

Scottish Planning Policy sets out that the planning system should encourage a mix of uses in town centres to support their vibrancy, vitality and viability throughout the day and into the evening (para 60). Scottish Planning Policy Annexe A sets out indicators of Health Checks which should be used to develop strategies for town centre improvements, this includes the evening / night-time economy. Within the Proposed Plan the phrase evening / night time economy is intended to describe the period beyond the traditional working day. It is accepted that in line with Scottish Planning Policy, reference to evening economy is sufficient. If the Reporter is so minded, SESplan would suggest removing 'night' from the last sentence of paragraph 5.15.

SESplan disagrees that additional text is required at paragraph 5.16 of the

Proposed Plan. Paragraph 5.16 sets out a Town Centre First Policy. The representation is concerned that the policy could be used to locate large developments on edge of centre sites taking business away from town centres and making local shops unviable. The purpose of the Town Centre First Policy is to direct development which would generate significant footfall to established centres with preference to town centre locations, including local centres before edge of town centre locations. The policy therefore addresses the concern by requiring that town centre sites are considered before edge of centre sites. **No modifications proposed.**

Edinburgh Association of Community Councils (040476)

SESplan disagrees that modification of the Proposed Plan is required to encourage early intervention to re-designate areas of town centres for uses other than commercial or retail. Paragraph 5.15 of the Proposed Plan requires local development plans to support all uses in town centres that generate significant footfall, including offices, community, cultural facilities and opportunities for town centre living. Local development plans will identify town centres. The function of Town Centres is set out at Table 5.4 of the Proposed Plan as a diverse mix of uses including shopping, residential, leisure and evening economy. **No modifications proposed.**

Haddington and District Amenity Society (803807)

SESplan disagree the plan should prevent out of centre development. Paragraph 5.16 of the Proposed Plan sets out a Town Centre First Policy. The purpose of the Town Centre First Policy is to direct development which would generate significant footfall to established centres with preference to town centre locations, including local centres. This requires consideration to be given to town centre locations, including local centres before any other location while accepting that it may not always be possible to locate within a town centre. Scottish Planning Policy Para 71 requires that where a retail development with a gross floorspace over 2,500m<sup>2</sup> is proposed outwith a town centre, contrary to the development plan, a retail impact analysis should be undertaken. Out-of-centre locations should only be considered for uses which generate significant footfall where: all town centre, edge of town centre and other commercial centre options have been assessed and discounted as unsuitable or unavailable; the scale of development proposed is appropriate, and it has been shown that the proposal cannot reasonably be altered or reduced in scale to allow it to be accommodated at a sequentially preferable location; the proposal will help to meet qualitative or quantitative deficiencies; and there will be no significant adverse effect on the vitality and viability of existing town centres. Local development plans will identify town and local centres within their area and set out appropriate retail policy. **No modifications proposed.**

Liberton and District Community Council (790396), Police Scotland (0400584)

SESplan disagree that modification is required. Policing is not a matter which can be set out in a Strategic Development Plan. **No modifications proposed.**

Roslin and Bilston Community Council (790524)

SESplan disagree that modification is necessary to protect town centres before retail parks. Paragraph 5.16 of the Proposed Plan sets out a Town Centre First Policy. The purpose of the Town Centre First Policy is to direct development which

would generate significant footfall to established centres with preference to town centre locations, including local centres. This requires consideration to be given to town centre locations, including local centres before any other location, including commercial centres. **No modifications proposed.**

SESplan disagree that the Proposed Plan should be modified to express the need for accessible facilities within town centres. Paragraph 5.15 of the Proposed Plan requires local development plans to support all uses in town centres that generate significant footfall including community facilities. The Town Centre First policy set out at paragraph 5.16 of the Proposed Plan requires that uses generating high footfall should consider in the first instance town centre locations. These requirements should ensure that where possible such uses are located within town centres while accepting that it may not always be possible to locate within a town centre. **No modifications proposed.**

Sportscotland (029346)

SESplan disagree that the Proposed Plan should state that flexibility is required in applying the Town Centre First policy set out at paragraph 5.16 of the Proposed Plan. The Town Centre First policy sets out a sequential approach, to be applied by local development plans, to locating uses that generate significant footfall. In applying the sequential approach Scottish Planning Policy, paragraph 69 requires a flexible approach to ensure that different uses are developed in the most appropriate locations and states that it is important that community, education and healthcare facilities are located where they are easily accessible to the communities that they are intended to serve. The Town Centre First policy set out at paragraph 5.16 that uses generating high footfall should consider in the first instance town centre locations. These requirements should ensure that where possible such uses are located within town centres while accepting that it may not always be possible to locate within a town centre. **No modifications proposed.**

TH Real Estate (035989)

SESplan disagree that the City Centre should be separately identified as the preferred location within the Town Centre First Policy. The Town Centre First Policy set out in paragraph 5.16 of the Proposed Plan reflects the sequential approach set out in paragraph 68 of Scottish Planning Policy. This identifies town centres, local centres and city centres as the preferred location for high footfall generating development. A hierarchy of centres is set out at Table 5.4 of the Proposed Plan. It identifies the City Centre and Strategic Centres. Paragraph 5.14 of the Proposed Plan states that the City Centre is the regional core. Table 5.4 of the Proposed Plan identifies four Strategic Centres providing functions at sub-regional level. The Strategic Centres support a wide geographical area. It would not be appropriate to require that local development plans within the region should set out a sequential approach which considered the City Centre to be a preferential location over town centres, strategic centres or local centres. **No modifications proposed.**

SESplan disagree that reference to the St James project should be included within the supporting text of Thriving Town Centres. SESplan acknowledge the importance of the project however the purpose of this section of the plan is to set out the approach for local development plans. It would not be appropriate to focus

on a single development. **No modifications proposed.**

The John Lewis Partnership (039926)

SESplan disagree that the Proposed Plan requires to be modified to encourage investment in the City Centre. The Proposed Plan sets out a vision for growth which should provide confidence in the investment potential of the region. It identifies a Central Business Cluster in the City Centre. Paragraph 5.16 of the Proposed Plan sets out a Town Centre First policy which sets out a sequential approach, to be applied by local development plans, to locating uses that generate significant footfall. This identifies the city centre, along with Local, Strategic and Town Centres as the preferred location for development generating significant footfall. Table 5.4 sets out a hierarchy of centres. Paragraph 5.16 requires local development plans to identify a network of centres taking account of the hierarchy and explain how they can complement each other. **No modifications proposed.**

VisitScotland (029385)

SESplan disagree that Table 5.4 should separately identify tourism as a function for the City Centre, Town and Strategic Centres. Table 5.4 identifies the function of the City Centre, Strategic Centres and Town Centres as including a diverse mix of uses and sets out what these include. It does not provide a comprehensive listing of all uses which could contribute to this mix. SESplan acknowledges the importance of tourism to the City Centre, Town Centres and Strategic Centres however it is considered that tourism could be an element of a number of those uses listed. **No modifications proposed.**

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]

<b>Issue 12</b>	<b>Enhanced Green Networks and Cross-Boundary Green Networks</b>	
<b>Development Plan reference:</b>	<b>Enhanced Green Networks – pages 50-51, paras 5.17 – 5.21; Cross-Boundary Green Networks, page 14, para 3.9.</b>	<b>Reporter: [Note: For DPEA use only.]</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Cala Management Ltd (929806)  Cramond and Barnton Community Council (803443)  The Crown Estate (Scotland Portfolio) (039431)  Cockburn Association (037249)  Denholm and District Community Council (040612)  Edinburgh Association of Community Councils (040476)  Edinburgh BioQuarter Partners (037370)  Esk Valley Trust (037349)  Forth Ports Ltd (929573)  Friends of the River Almond Walkway (925870)  Mr Jon Grounsell (786916)  Gullane Area Community Council (037068)  Liberton and District Community Council (790396)</p>	<p>Mrs Mirabelle Maslin (928549)  Midlothian Green Party (778339)  Murieston Community Council (812156)  National Trust for Scotland (040626)  New Ingliston Ltd (929755)  NHS Lothian Public Health and Health Policy (840024)  ORS (037419)  Rural Renaissance (039402)  Mrs Gail Reid (035887)  Roslin and Bilston Community Council (790524)  RSPB Scotland (031480)  Scottish Environmental Protection Agency (790577)  Scottish Government (034404)  Scottish Natural Heritage (790587)  Scottish Wildlife Trust (038549)  Mr Charles Strang (907037)</p>	
<b>Provision of the Development Plan to which the issue relates:</b>	Section 3, Spatial Strategy: Cross-Boundary Green Networks and Section 5, A Place for Communities: Enhanced Green Networks.	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Cala Management Ltd</u>  Green Networks should not be a factor in the determination of planning applications.</p> <p><u>Cramond and Barnton Community Council</u>  Ensure River Almond corridor between Cramond Brig and Kirkliston is included in Edinburgh and West Green Network Priority Area.</p> <p><u>The Crown Estate (Scotland Portfolio)</u>  Support Edinburgh and East Green Network Priority Area but would like to discuss this in relation to their landholdings. There is scope to link with paths already developed by the Crown Estate. The Crown Estate have already created a</p>		

Development Framework for land at Rosewell which is connected with promotion of housing sites and how these sites can connect into existing routes in and around Rosewell and the surrounding countryside. Would also support investigation of enhanced green network links between Rosewell and Easter Bush/Bush, and train stations at Newtongrange and Gorebridge.

Cockburn Association

Support in principle, but policy is seriously flawed due to erosion of Green Belt due to growth corridors. Support green networks which retain substantial areas of green belt and countryside.

Denholm and District Community Council

Berwickshire and southern areas of Roxburgh are not included in Green Networks but have landscape character and features. Attractive coastline to east lacks investment encouragement.

Edinburgh Association of Community Councils

Support, but paragraph 5.18 needs greater clarity in reference to making areas more attractive to investors. Areas adjacent to Green Networks may come under pressure for development.

Edinburgh BioQuarter Partners

Seeks greater detail / clarity on the second bullet point of paragraph 3.9, specifically 'developments for which land has already been allocated.'

The two Cross-Boundary Green Network Priority Areas referenced in the text are not explicitly identified in Figure 5.2. Second bullet of paragraph 5.21 is unclear, in particular the reference to developments for which land has already been allocated sits incongruously within the sentence. Similarly, the context that the Strategic Frameworks will provide for planning decisions, as referred to in the third bullet-point, should be clarified.

Esk Valley Trust

Support, particularly in east and south east. Concerned that non cross-boundary areas are left to member authorities to provide a non-statutory plan.

Forth Ports Ltd

Plan does not provide any justification for the non-statutory status of Frameworks to be prepared by member authorities. Frameworks could potentially promote inappropriate proposals and requirements in Forth Port's estate, where for security and safety reasons, public access is prohibited within operational ports. Class 35 of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 does not accommodate opportunities for the promotion of Green Networks. Fife's LDP was modified as a result.

Friends of the River Almond Walkway

Support general principle of green networks and green corridors. Would like to see proper access to River Almond at Kirkliston, but not clear if this is included. River Almond Walkway should be made into a disability-compliant route.

Mr Jon Grounsell

Green Network strategy needs to take full cognisance of landscape setting, views and potential for enhancement including townscape and buildings in the countryside. A landscape character assessment is needed to inform Green Network strategy, assessing what exists at present and what improvements can be made and what impacts will follow from development. This section of the plan is not supported and should be modified to contain a greater emphasis on landscape. The green network strategy adopted by the proposed plan does not constitute a rigorous and effective appraisal of landscape qualities.

Gullane Area Community Council

North Berwick not included on Green Network area but this should have protection from Countryside around towns and other designations. Approach to enhancing green infrastructure should extend beyond the periphery of Edinburgh.

Liberton and District Community Council

Concerned that one of the aims of Green Network Priority Areas is to encourage investors and facilitate development beyond the boundaries of the strategic development areas.

D and L McAuslan

Support Green Networks. Concerned development of A701 relief road will mean additional housing which Green Network would be unable to support. A701 Concerned over loss of agricultural land in relation to A701 relief road.

Mrs Mirabelle Maslin

Critical paragraph 3.9 'Identify and safeguard those elements of the green network that provide, or have the potential to provide, the greatest benefits for people and nature.' is carried through. Publically accessible toilets should be considered in the development of green networks.

Midlothian Green Party

Support policy but concept is too limited and should include further means of protection for agricultural land and green belt.

Murieston Community Council

Poor alignment between Green Network Technical Note and Proposed Plan areas are not consistent. Livingston Masterplan, 1963 contains a structural landscape plan which created the natural features of Livingston. Proposed Plan does not reflect this aspiration from the original plans and is potentially detrimental.

National Trust for Scotland

National Planning Framework sets out ambition for National Ecological Network. Corridors should be sufficiently large scale to support species and habitats.

New Ingliston Ltd

Concerned Green Network Priority Area 7 will negatively impact on the delivery of the IBG site. Supplementary Guidance should take into account existing West Edinburgh Landscape Framework. Would welcome opportunity to contribute to

guidance.

#### NHS Lothian Public Health and Health Policy

Support the emphasis on protecting and developing Cross-Boundary Green Network Priority Areas as this will have beneficial impacts on public health. Green infrastructure such as parks, playgrounds and other open spaces are particularly important in more urbanised areas. The decision to release some parts of the Green Belt for housing development is understood but it is important that this is not viewed as a model for future plans. One plan does not set the precedent for the next.

#### ORS

Concerned about the implications for existing Local Development Plan sites from the Green Networks Supplementary Guidance, particularly sites which already have planning approvals and Redheugh new community in Midlothian which is to be masterplanned. This could lead to unnecessary delay and complication.

#### Rural Renaissance

Green networks should not be drawn tightly around settlements as they will prevent expansion. Green networks should not be designated where other landscape designations exist due to lack of clarity. Scottish Borders approach to Countryside Around Towns will be detrimental economic, social and sustainability aims of the Plan by not allowing growth of settlements.

#### Mrs Gail Reid

Support policy which protects open spaces and places for people to walk and explore. Concerns about coalescence.

#### Roslin and Bilston Community Council

Path networks could seriously affect wildlife as a result of dog walkers. Green wedges and Green Networks are no substitute for Green Belt agricultural land. Green spaces are important for gardens and allotments.

#### RSPB Scotland

Support Green Networks. Unsure that cross-boundary priority areas can be achieved without inclusion in Local Development Plans. Would welcome chance to contribute. Disappointed Inner Forth Futurescape is not included in Green Network areas in the plan. Section could do more to support coordination between authorities in relation to sustainable flood alleviation. Sustainable flood alleviation through natural flood management (NFM), such as the creation of wetland habitats, has the ability to support climate-change adaptation as well as a range of wider benefits for biodiversity and also improving people's access to recreational space and green travel routes. Reference should be made to the 'Seas of Change' report (REF) and Inner Forth Futurescape (REF). River restoration should be considered to support adaptation to climate change. Plan should include policies to prevent further peat extraction and support restoration of peat sites.

Proposed growth corridors present significant opportunities for enhancing biodiversity and green space.

Scottish Environmental Protection Agency

Supports benefits of green networks but consider these cannot be compensation for loss of flood plain.

Scottish Government

Consideration of cross-boundary flooding matters though Supplementary Guidance on Cross-Boundary Green Network Priority Areas does not satisfy paragraph 261 of Scottish Planning Policy. Cross-boundary impacts on water management should be considered as a minimum.

Scottish Natural Heritage

Representation requests that the Forth Bridgehead area be reconsidered as a Green Network Priority Area in light of the amount of pressure and change being faced by this area. As part of green network priority areas it is not clear if specific actions for coastal opportunities are included for east and west Edinburgh and around Leven.

Scottish Wildlife Trust

There must be greater harmonisation with the Edinburgh Living Landscape especially since the City of Edinburgh Council are a founding partner. Considerable thought must be given to biodiversity and connectivity.

Mr Charles Strang

Proposed Cheviots National Park should be a Green Network Priority Area as area of great strategic importance for green network protection and enhancement.

**Modifications sought by those submitting representations:**

Cala Management Ltd

Paragraph 5.21: Delete 3rd Bullet Point.

Cramond and Barnton Community Council

Include River Almond corridor between Cramond Brig and Kirkliston is included in Edinburgh and West Green Network Priority Area.

The Crown Estate (Scotland Portfolio)

Suggests possibility to incorporate paths already created by the Crown Estate into Edinburgh and East Green Network Priority Area.

Cockburn Association

Paragraph 5.18: 1st bullet: Delete existing text, insert: 'Improving green networks in general will also make places more attractive for residents and investors'.

Add new 2nd bullet: 'By taking appropriate measures to reduce the dangers to wildlife crossing transport routes'.

Paragraph 5.21, 1st bullet: Delete: 'safeguard', insert 'protect'.

Denholm and District Community Council

No modification specified, representation indicates Berwickshire and southern areas of Roxburgh should be included in Green Networks section of the plan.

Edinburgh Association of Community Councils

Clarify paragraph 5.18 in relation to making areas more attractive to investors.

Edinburgh BioQuarter Partners

Amend second bullet point of paragraph 3.9 specifically to give greater clarity on 'developments for which land has already been allocated.'

Amend Figure 5.2 to identify Cross-Boundary Green Network Priority Areas.  
Redraft second bullet of paragraph 5.21 to include greater clarity on developments for which land has already been allocated.

Esk Valley Trust

No modification specified, representation indicates concern that leaving non cross-boundary areas to individual member authorities is not a supported approach.

Forth Ports Ltd

The text at paragraph 5.21 should be amended to provide flexibility to accommodate necessary port operation requirements and those of other statutory or commercial operators who are unable to accommodate green networks for legitimate reasons. Amend paragraph 5.21 to: These frameworks will:

- Identify and safeguard, where possible, those elements of the green network...
- Identify strategic enhancements, where possible, to green networks...

Friends of the River Almond Walkway

Request that River Almond at Kirkliston is included in Green Network Priorities. River Almond Walkway should be made into a disability-compliant route.

Mr Jon Grounell

Undertake a landscape character assessment for the whole region and consider landscape setting, townscape and views. Proposed plan should be modified to contain more explicit references to landscape - this should take priority ahead of the enhanced green networks section of the plan.

Gullane Area Community Council

None specified, but representation notes that North Berwick is not included on Green Network Priority Area.

Liberton and District Community Council

The Plan should have a separate Green Network policy for areas in and not in strategic development areas.

Mrs Mirabelle Maslin

Publically accessible toilets should be considered in the development of green networks.

Midlothian Green Party

Include further means of protection for agricultural land and green belt.

#### Murieston Community Council

Request a review of Green Network areas. Livingston, especially south Livingston, should be included to protect it from development Include Area/Project 8 (East Calder area, including the A71 corridor east to Edinburgh) and Area / Project 6 (Whitburn to Fauldhouse and settlements east along the Breich Water) are joined by extending Area/Project 6 east to Area/Project 8. As such the limit of the additional Green Network should be the River Almond to the North and Linhouse Glen nature reserve/Edinburgh to Carstairs rail line to the south.

#### New Ingliston Ltd

Supplementary Guidance should take into account the existing West Edinburgh Landscape Framework.

#### NHS Lothian Public Health and Health Policy

No modification specified, representation indicates it would be helpful to include a statement that emphasises the benefits of smaller areas of greenspace and open space beyond the Green Network Priority Areas.

#### ORS

Request wording of the second bullet point at paragraph 5.21 of the Proposed SDP be amended to: 'Identify strategic enhancements to green networks that will add value to existing settlements, and developments or allocations, where a detailed masterplan has not yet been produced or committed to'.

#### Rural Renaissance

Green Belt and Countryside Around Towns policies should not draw the boundary so tightly that there is no scope for future growth. In the interests of clarity, green networks should not be designated where there are already existing landscape designations.

#### Roslin and Bilston Community Council

Add that every development must have green space - possibly for allotments or leisure areas. Green networks are no substitute of green belt agricultural land.

#### RSPB Scotland

Green Networks are adopted into LDPs. Section could do more to support coordination between authorities in relation to sustainable flood alleviation. Reference should be made to the 'Seas of Change' report (REF) and Inner Forth Futurescape (REF). Consideration to green networks to the east of the SESplan area, i.e. extending along the A1 corridor to Haddington and Dunbar as this is identified as a strategic development area. Reference to Natural Flood Management and protection of deep peat.

#### Scottish Environmental Protection Agency

This objection can be addressed by the removal of 'Flood management' or the inclusion of a wording, to be agreed with SEPA, of what role green networks can have in mitigating flood risk.

#### Scottish Government

Consideration of cross-boundary flooding matters though Supplementary Guidance

on Cross-Boundary Green Network Priority Areas does not satisfy paragraph 261 of Scottish Planning Policy. Cross-boundary impacts on water management should be considered as a minimum.

#### Scottish Natural Heritage

Frameworks must consider delivery mechanisms. Clearer direction needed in paragraph 5.18 to guide LDP work on non-statutory frameworks. Including a hook in the technical note. Further consideration given to Forthbridgehead area and potential for this to be allocated as a Green Network Priority Area. Clarity required on whether specific actions for coastal opportunities are included for east and west Edinburgh and around Leven.

#### Scottish Wildlife Trust

There must be greater harmonisation with the Edinburgh Living Landscape especially since the City of Edinburgh Council are a founding partner. Reference should be made to the need to invest properly in natural capital and green infrastructure (Para 3.10). Include reference to Edinburgh Living Landscape (Para 3.17).

#### Mr Charles Strang

A strategic framework should be prepared for three cross boundary Green Network Priority Areas. Reference to the need for management plans for National Scenic Areas as part of Local Development Plans. Modify paragraph 3.9 to include the northern Cheviots and on into the Tweed Valley from the Pennine Way as a Green Network Priority Area. A Green Network should be identified within the Scottish Borders linking to the Pennine Way.

### **Summary of responses (including reasons) by Planning Authority:**

#### **Plan policy/text**

##### Cala Management Ltd

Disagree with modification. This direction is deliberately in bold so as to provide clear guidance to member authorities on this issue. Green networks have a range of benefits and are intended to enhance development, not preclude it from taking place. The Development Plan for each member authority comprises the relevant LDP and the Strategic Development Plan. Green networks perform a wide range of benefits – they are not substitutes for Green Belt and do not perform the same function. **No modification proposed.**

##### Cockburn Association

Disagree with modifications. No clear benefit can be seen from the alternative/minor modifications to text being proposed. The Proposed Plan is intended to be a concise, visionary, map based document. The list of benefits provided by green networks (paragraph 5.18) is not intended to be exhaustive. **No modifications proposed.**

##### Cockburn Association, Edinburgh Association of Community Councils

Disagree that first bullet point of paragraph 5.18 'Improving quality of place to make the area more attractive to residents and investors' needs amended or clarified. Green networks have a range of benefits for residents and businesses. The second

line of para 5.18 clearly states that ‘Well designed, multi-functional green networks are a fundamental component of successful places.’ **No modifications proposed.**

Edinburgh BioQuarter Partners, ORS

Disagree with modifications. Local authority boundaries are shown on Figure 5.2 to allow the reader to identify which Green Network Priority Areas are Cross-Boundary areas. CBGNs are identified on Figure 5.2 and appear as 7+8 on this diagram. Supplementary Guidance will provide greater detail on paragraph 5.21, including land and development for which land has already been allocated. **No modifications proposed.**

SESplan does not consider the proposed minor alteration would add any value to the Proposed Plan. The existing wording in paragraphs 3.9 and 5.21 is consistent and is intended to give clear direction to member authorities in relation to non-statutory frameworks for Green Network Priority Areas. It is not the purpose of the plan to examine individual sites. The green network frameworks will be informed by a range of factors, including consented development. **No modification proposed.**

Esk Valley Trust

Although guidance for non cross boundary Green Network Priority Areas will be non-statutory, the inclusion of green networks in the Proposed Plan means they are part of the development plan as a whole and therefore must be considered by member authorities. **No modification proposed.**

Forth Ports Ltd

Disagree with modification. The bold text makes clear that 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’. This does not preclude development from taking place in Green Network Priority Areas, but it does make clear that all development must take treatment of green networks and enhancements into account. Green Networks do not necessarily mean public access; they fulfil biodiversity and other environmental functions. **No modification proposed.**

Mr Jon Grounsell

Disagree with modification. Following the adoption of SDP1, extensive early engagement was undertaken with member authorities and key agencies, including workshops to analyse and evaluate the best approach to green networks for SDP2, in line with NPF3 and SPP. The findings of this early engagement has been incorporated into preparation of SDP2, and the Green Network Technical Note (October 2016) contains more details on individual Green Network Priority Areas. **No modification proposed.**

New Ingliston Ltd

The proposed IBG is intended to have a high quality landscape framework. It has been acknowledged that multiple strategies already apply in this area, including the West Edinburgh Landscape Framework. Green Networks do not preclude development, they are intended to enhance it. **No modification proposed.**

NHS Lothian Public Health and Health Policy

The benefits of smaller scale green infrastructure and access to green/open space is clearly referenced in the Placemaking Principles section of the Proposed Plan.

**No modification proposed.**

Midlothian Green Party

Disagree with modification. This is dealt with elsewhere in the plan. The Placemaking Principles contains a clear direction in relation to agricultural land, and the Green Belts and Related Countryside Designations has guidance on Green Belts. **No modification proposed.**

Roslin and Bilston Community Council

Disagree with modification. Not considered appropriate to add a requirement at strategic plan level which dictates that all development must have green space. The Placemaking Principles section of the plan contains clear guidance on development and green infrastructure. SESplan do not consider Green Networks as substitute for Green Belt. **No modification proposed.**

RSPB Scotland, Scottish Government

It is not the role of Supplementary Guidance to look at cross boundary flooding issues. More detail on strategic flooding is set out in the Placemaking Principles and Key Areas of Change sections of the Proposed Plan. The Placemaking Principles include a number of flood risk related requirements, while more specific local issues have been identified in the Key Areas of Change section of the plan for South East and Edinburgh and West. SESplan's Strategic Flood Risk Assessment (REF) has been produced to inform the Spatial Strategy of the Proposed Plan. The updated addendum will provide member authorities with additional information. **No modification proposed.**

Rural Renaissance

Note the response, but no modification specified. Green Networks identified in SDP2 are large strategic areas and are not tightly drawn – their exact application will be through Supplementary Guidance and member authorities. Green networks provide different functions beyond specific landscape designations. It is not the purpose of SDPs to repeat policies from elsewhere. Countryside Around Town designations are a matter for LDPs. **No modification proposed.**

Scottish Environmental Protection Agency

The Placemaking Section of the Proposed Plan makes clear reference to locating development away from functional flood plains. SESplan agree that green networks should not be compensation for loss of flood plain. If the reporter is so minded, text could be made clearer at paragraph 5.18. **No modification proposed.**

Scottish Wildlife Trust

It is acknowledged by SESplan that multiple strategies already apply in this area. Strategies such as ELL may be applied at member authority/LDP level. **No modification proposed.**

### **Spatial Strategy**

Cramond and Barnton Community Council; Friends of the River Almond Walkway; Murieston Community Council

Following consultation at the Main Issues Report, SESplan have rationalised and enlarged the Edinburgh and West Green Network Area to form a larger, cross boundary area which includes the River Almond, and the A71 corridor. Considered appropriate to retain separate designation for Whitburn to Fauldhouse (Strategic Green Network Priority Area 6 – Polkemmet and Briech Water) as this has distinct characteristics from the Edinburgh and West Green Network Area. More detailed considerations can be assessed in LDPs where appropriate. **No modification proposed.**

The Crown Estate (Scotland Portfolio)

Note the response. This is a detailed matter for consideration in forthcoming supplementary guidance and LDPs. **No modification proposed.**

Denholm and District Community Council; Rural Renaissance; Mr Charles Strang

One Strategic Green Network Area has been identified for the Central Borders Area. This includes the Central Borders and Western Borders. The area has relatively high levels of development proposed, a growing tourism role and is served by Borders Rail. The nine themes used to assess and allocate Green Networks are outlined in the Green Network Technical Note (October 2016). The existing allocation was considered to have the closest alignment with these nine themes compared to other areas in the Scottish Borders. Other areas including the Cheviots, Berwickshire/Eastern Borders and southern Roxburghshire are not the focus of the same level of development and do not suffer from the same level of deprivation or vacant and derelict land issues, so are better served by green networks at the LDP level. The Scottish Borders is not within the Central Scotland Green Network (National Development in NPF3 – REF).

SESplan do not support identifying Scottish Cheviots as a third Cross Boundary Green Network Priority Area. 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.

Green networks are intended to enhance development, not prohibit it. **No modification proposed.**

Gullane Area Community Council

The East Lothian Coast is covered from Edinburgh to Longniddry by the Edinburgh and East Green Network Priority Area. Much of the remaining East Lothian Coast is already covered by existing statutory protections and designations. Green networks at the local level are best devolved to the East Lothian LDP. **No modification proposed.**

Liberton and District Community Council

Disagree with proposed modification. The proposed plan defines green networks

as connected areas of green and blue infrastructure and aims to identify and enhance green networks at a strategic level across the plan area. This approach will be supported by Placemaking Principles (pages 16-17), in addition to Supplementary Guidance in the form of Strategic Frameworks for the two Cross-Boundary Green Network Priority Areas and non-statutory Frameworks for the remaining Green Network Priority Areas. It is not considered appropriate to adopt a different policy for green networks depending on whether or not they are located in an area of strategic growth – this could undermine connectivity and integration of green networks. SDP2’s approach to green networks was developed after the Main Issues Report stage and used extensive early engagement with member authorities and key agencies. A more detailed appraisal of each Green Network Priority Area can be found within the Green Network Technical Note (October 2016). The preferred approach is to identify the key strategic green network requirements, while setting a vision for local green network development as an integral element of the Placemaking Principles. While the SDP will illustrate the strategic connections and principles for green network development it is intended that the LDPs will set out the more detailed plans and proposals for sites within the areas of strategic development, as well as identifying more local-level green network priorities, as appropriate. **No modification proposed.**

#### National Trust

Corridors have important biodiversity benefits. Finer detail of each green network will be set out in Supplementary Guidance, LDPs and other relevant member authority guidance. **No modification proposed.**

#### Mrs Gail Reid

The Spatial Strategy and Placemaking sections of the Proposed Plan contain clear direction to member authorities aimed at the prevention of coalescence. **No modification proposed.**

#### RSPB Scotland

Green networks at the local level are best devolved to the East Lothian LDP. **No modification proposed.**

#### Scottish Natural Heritage

Three areas are already identified as priority areas in Fife. These are considered greater in terms of green network priority as they have a greater alignment with green network themes than the Fife Bridgehead area. **No modification proposed.**

#### **Other issues**

##### Mirabelle Maslin

This is not a comment on a strategic plan matter. The SDP exists to set out strategic directions for growth and locations for investment and is intended to be a visionary, concise, map based document. Provision of public toilets can be assessed at a local level. **No modification proposed.**

23 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.]

<b>Issue 13</b>	<b>Supporting Non-Car Travel</b>	
<b>Development Plan reference:</b>	<b>Supporting Non-Car Travel, page 55</b>	<b>Reporter: [Note: For DPEA use only.]</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Mr Keith Bedborough (856480) Ms Alison Bowden (029896) Cockburn Association (037249) Corstorphine Community Council (040316) Cramond and Barnton Community Council (803443) Denholm and District Community Council (040612) Esk Valley Trust (037349) Gullane Area Community Council (037068) Liberton and District Community Council (790396) Linlithgow & Linlithgow Bridge Community Council (930033)	Mactaggart & Mickel (038949) Mr Mike Martin (798523) Mrs Mirabelle Maslin (928549) Midlothian Tourism Forum (790754) The National Trust for Scotland (040626) NHS Lothian Public Health and Health Policy (840024) North Berwick Community Council (035522) Roslin and Bilston Community Council (790524) RSPB Scotland (031480) Scottish Government (034404) Shawfair LLP (039940) Shepherd Offshore (Scotland) Ltd (038954) Mr Charles Strang (907037)	
<b>Provision of the Development Plan to which the issue relates:</b>	A better connected place – supporting non-car travel, including walking and cycling.	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Mr Keith Bedborough</u> SDP should provide far clearer guidance on how development will support sustainable transport, in particular cycling. Developers provide at best lip service to provide the minimum facilities rather than genuinely trying to provide integration into the broader sustainable transport network.</p> <p><u>Ms Alison Bowden</u> The Dalkeith area is highly populated, with future housing planned, but there is little cycle provision that is safe and suitable for those wishing to commute into the city. Cycle provision should be planned for this area.</p> <p><u>Cockburn Association</u> Support statements on density of development and ensuring that transport infrastructure is in place instead of development. The implications for the ongoing development of vehicular technology will have implications at a local level, including reducing some of the perceived adverse effects of commuting by car. This creates more flexibility for the location of new housing e.g. not always close to existing</p>		

settlements. In relation to walking and cycling, representation supports network enhancements, and highlights that designating/constructing the network is important, but so is its effective management for the benefit of all users.

#### Corstorphine Community Council

Support inclusion of Non Car Travel and transport hierarchy in SDP. Wish to increase budgets for active travel from currently low levels to deliver routes. Support reference to CAPS in paragraph 6.5 and requirement for integrating walking and cycling in LDPS (paragraph 6.8). Designing streets is six years old and is no longer best practice in guidance for development. The current Scottish cycling design standards have done little to create modal shift to cycling as per the recent CAPS update. Designing streets also conflicts with definitions of strategic routes which refer to off-road routes whilst designing streets prefers on road. Support definition of functional active travel routes (6.6), but the definition must be clearer. Expect to see planning/design guidance attached to functional and recreational routes as per section 6.2 for new developments, but it is not referenced which is detrimental to ensuring high quality provision of functional and recreational walking and cycling routes.

#### Cramond and Barnton Community Council

Need to include a strategic functional walking and cycling route connection between Gyle/Maybury and Barnton thereby extending the orbital route around the City and connecting Cramond and Barnton to the Gateway Transport Interchange and retail and business activities at the Gyle and Gogar and identified West Edinburgh Business Cluster.

#### Denholm and District Community Council

Concern raised over lack of recreational routes included in Southern Borders.

#### Esk Valley Trust

Support policies on walking and cycling. Figure 6.1 - add North Esk Way as a recreational route.

#### Gullane Area Community Council

East Lothian LDP conflicts with para 6.3 regarding location of large scale housing development as it allocated large sites in small rural communities. They don't have good access to town centres and employment locations by walking, cycling and public transport. Plan should ensure the provision of safe walking and cycling, and particularly cycling, routes between the main villages in our community council area and the railway stations at Drem and Longniddry.

#### Liberton and District Community Council

Support statements in plan but question whether they will be implemented based on LDP experience. Need to consider use of former rail lines for public transport proposals. Support walking and cycling proposals.

#### Linlithgow & Linlithgow Bridge Community Council

Schools, town centre, commercial centre and public transport nodes in every settlement should be accessible by a safe footpath and cycleway. This should be mandatory for any new development (residential or commercial). Specific to West

Lothian there should be a new road, footpath and cycleway linking Linlithgow to Livingston (its regional centre).

Mactaggart & Mickel, Shawfair LLP, Shepherd Offshore (Scotland) Ltd

Proposed Plan and LDPs must take current as well as future planned transport needs into account to ensure the timely delivery of transport infrastructure. Alignment between key parties is central to removing constraints on development and allows housebuilding to take place at a rate which meets demand in areas of demand. The Plan directs that 'Local Developments Plans will ensure that large-scale housing development is located where there is good access to town centres and employment locations by walking and cycling routes and by public transport. The use of the present tense 'where there is' does not allow for future or planned improvements or investments in associated with planned development.

Mr Mike Martin

Using sustainable public transport or active travel options allows access to Edinburgh's opportunities for more outlying communities, and helps to dilute the demand for Green Belt land.

Mrs Mirabelle Maslin

Sustainable transport improvements should not risk public safety. Support 6.3 and 6.4 but need assurance that this will be delivered based on experience in Midlothian. Question how development, delivery and safeguarding requirements of paragraphs 6.7 and 6.8 will be enforced.

Midlothian Tourism Forum

Need to connect Vogrie Country park with deprived communities in Midlothian which have no active travel access. Plan should include Proposed Recreational Cycle Routes linking Vogrie to Dalkeith, Newtongrange and Gorebridge. The building of 6,392 houses (committed and proposed) within a five mile radius of Vogrie will create yet further demand for such "non-car access" - which in turn is a recurring theme throughout the Plan.

The National Trust for Scotland

Active travel is not sufficiently addressed in the plan, rating only one mention. Regional planning should be a tool to help ensure that economic activity, recreation and residential provision are suitably located to make active travel possible.

NHS Lothian Public Health and Health Policy

Development across the region is likely to increase the number of car journeys. There are eleven Air Quality Management Areas in south east Scotland already. There should be a clear statement about problems with Air Quality in the SESplan area to emphasise the importance of developing an active travel and carbon-neutral public transport infrastructure. Support paragraph 6.2 but wording needs strengthened. Support direction to 'ensure that this [transport infrastructure] is delivered ahead of, or as part of, new development.

Section 6.3 Suggest that a) 'as part of' is refined to say 'before 50% of development is complete' so that developers cannot wait until house building is finished before providing infrastructure.

North Berwick Community Council

Need to consider local and area wide walking and cycle routes around North Berwick.

Roslin and Bilston Community Council

Need for a highly effective and complete network of transport, including cycle/walking paths and lanes, for business and leisure use. This needs to connect safely and effectively with our roads. Not an easy task because of the bad state and narrowness of our local roads. What can be done to help? We need this now, before any more development takes place. How can it be funded?

RSPB Scotland

Support the improvement of infrastructure for walking, cycling and train travel, but believe that more could be done than what is outlined in the plan e.g. more designated space on trains and stations for bikes and more bike-rental scheme.

Scottish Government

Text should be included at paragraph 6.1 or 6.2 stating 'Significant travel-generating uses should also be sited at locations which are well-served by public transport and be subject to parking restraint'. This would help to address the requirements identified in paragraph 278 of SPP.

Text should be included within the Walking and Cycling section (paras 6.5 – 6.8) to state 'Local authorities are encouraged to develop at least one exemplar walking and cycle friendly settlement to demonstrate how active travel routes could be improved significantly.' This would help to address the requirement of NPF3 paragraph 5.14.

Mr Charles Strang

Paragraph 6.4 - While a Strategic Development Plan, it would surely be transparent and appropriate to provide guidance on the actual meaning of higher development densities. Paragraph 6.6 - there might be a potential strategic walking and cycling route as part of safeguarding the line of the Berwickshire railway from Tweedbank to Berwick. Figure 6.1 - at the very least there should be linkages from Kelso along the Tweed to Berwick, and from Kelso to Yetholm and the Northern end of the Pennine Way.

**Modifications sought by those submitting representations:**

Mr Keith Bedborough

SDP should provide far clearer guidance on how development will support sustainable transport, in particular cycling.

Ms Alison Bowden

Modify Figure 6.1 to include cycle route from Dalkeith to Edinburgh.

Cockburn Association

Paragraph 6.1 - Insert statement of requirement to monitor improvements in vehicle emissions and related opportunities for more flexible options to locate housing land.

Paragraph 6.6 - Insert new sentence and after 2nd sentence: 'Provisions for good

management of shared networks should also be made’.

#### Corstorphine Community Council

Paragraph 6.2, 2nd sentence - replace ‘should’ with ‘must’.

Paragraph 6.2 - Remove reference to designing streets and replace with up to date guidance such as London Cycling Design Standards or Design Guidance Active Travel (Wales) Act 2013. Paragraph 6.5 - Insert statement that infrastructure developments for rail, bus, tram and vehicular access should also have good quality walking and cycling access.

Paragraph 6.6 - modify definition of strategic functional route to reflect that pedestrians and cyclists should be separated for strategic travel corridors as per London policy guidance.

Paragraph 6.6 - delete reference to varying quality under definition of recreation route. Replace statement that all new routes and improvements should be of good quality and accessible to all.

Paragraph 6.6 - include reference to Welsh and London best practice guidance in order to ensure high quality walking/cycling design standards and provision.

#### Cramond and Barnton Community Council

Show functional link between Gyle/Maybury and Edinburgh Gateway Interchange and Barnton.

#### Denholm and District Community Council

Figure 6.1 should include circular recreational route travelling through all parts of the Scottish Borders.

#### Esk Valley Trust

Figure 6.1 - add North Esk Way as a recreational route.

#### Gullane Area Community Council

Insert following statement to paragraph 6.3: "Ensure that the scale of housing developments in rural locations which have inadequate transport infrastructure is proportionate to the size of the existing communities."

#### Liberton and District Community Council

Paragraphs 6.2 or 6.3 insert statement stating that "disused rail (etc.) routes will be evaluated to see if they could contribute to delivering off-road public transport services e.g. bus and light rail / tram services and associated park and ride facilities (e.g. the Waverley Line to Loanhead rail route could tie in two potential park and ride facilities on the Gilmerton and Lasswade roads.)"

#### Linlithgow & Linlithgow Bridge Community Council

Modify paragraph 6.3 so that it applies to all development, not just housing. Add to figure 6.1 a walking and cycling route between Linlithgow and Livingston.

#### Mactaggart & Mickel, Shawfair LLP, Shepherd Offshore (Scotland) Ltd

Line 1, Paragraph 6.3 - Modify ‘Local Developments Plans will ensure that large-scale housing development is located where there is good access to town centres and employment locations by walking and cycling routes and by public transport’ to allow larger scale housing development to be located where good access will be

created by future and planned improvements associated with planned development.

Mrs Mirabelle Maslin

Paragraph 6.3, replace all instances of 'will' with 'must'.

Paragraph 6.4, replace all instances of 'should' with 'must'.

A new paragraph, after 6.4, should be added to say that development that does not accord with the previous two paragraphs will not be granted planning permission.

Midlothian Tourism Forum

Diagram 6.1 - modify to include Proposed Recreational Cycle Routes linking Vogrie Country Park to Gorebridge, Newtongrange and Dalkeith (including Mayfield and Easthouses).

The National Trust for Scotland

Increases the number of references to active travel in the plan.

NHS Lothian Public Health and Health Policy

Include clear statement about problems with air quality in the SESplan area to emphasise the importance of developing an active travel and carbon-neutral public transport infrastructure.

Paragraph 6.2 - change should to will in third sentence.

Paragraph 6.3 - add 'before 50% of development is complete' after 'new development'.

North Berwick Community Council

Include strategic walking and cycle routes to North Berwick.

Roslin and Bilston Community Council

In paragraphs 6.3 and 6.4, replace **should** with **must**.

In paragraph 6.3 and 6.4, insert requirement that walking and cycle routes should be in place before development.

In paragraphs 6.5 to 6.8, insert statement as to how routes will be funded.

RSPB Scotland

Include reference for need for bike rent schemes and more spaces at stations and on trains for bikes.

Scottish Government

Paragraph 6.1 or 6.2 - add text stating 'Significant travel-generating uses should also be sited at locations which are well-served by public transport and be subject to parking restraint.' □

Walking and Cycling, paras 6.5 – 6.8, add text stating 'Local authorities are encouraged to develop at least one exemplar walking and cycle friendly settlement to demonstrate how active travel routes could be improved significantly. "

Shawfair LLP

Line 1, Paragraph 6.3 - Modify 'Local Developments Plans will ensure that large-scale housing development is located where there is good access to town centres and employment locations by walking and cycling routes and by public transport' to allow larger scale housing development to be located where good access will be created by future and planned improvements associated with planned development.

Shepherd Offshore (Scotland) Ltd

Line 1, Paragraph 6.3 - Modify 'Local Developments Plans will ensure that large-scale housing development is located where there is good access to town centres and employment locations by walking and cycling routes and by public transport' to allow larger scale housing development to be located where good access will be created by future and planned improvements associated with planned development.

Mr Charles Strang

Paragraph 6.4 - include guidance on the actual meaning of higher development densities.

Paragraph 6.6 and Figure 6.1- include strategic walking and cycling route as part of safeguarding the line of the Berwickshire railway from Tweedbank to Berwick.

Figure 6.1 - include routes from Kelso along the Tweed to Berwick, and from Kelso to Yetholm and the Northern end of the Pennine Way.

**Summary of responses (including reasons) by Planning Authority:**

**Active Travel**

Mr Keith Bedborough

Disagree with proposed modification. The plan is intended to be a concise, visionary, map based document which will inform LDPs. SESplan supports the vision that by 2020, 10% of all journeys in Scotland will be taken by bike. The Spatial Strategy section of the plan makes a number of references to reducing commuting by road, improving non-car travel and also identifies a number of Strategic Transport Improvements. This is supported by the Placemaking Principles which make clear reference to the importance of, and need to enhance, walking and cycling networks. The Supporting Non-Car Travel and Walking and Cycling sections of the plan go on to make a number of clear directions to LDPs, including paragraph 6.2 which directs that 'Development should take account of the needs of people before the movement of cars'. Figure 6.1 Strategic Walking and Cycling Routes also identifies a number of existing and proposed priority functional walking and cycling routes, giving a clear strategic commitment to infrastructure improvements for walking and cycling. This commitment within the plan is also reflective of the visions of NPF3 and SPP which set out the policy framework for reducing carbon emissions and adapting to climate change. **No modification proposed.**

Ms Alison Bowden

Disagree with proposed modification. Figure 6.1 Strategic Walking and Cycling Routes shows an indicative proposed functional route connecting Dalkeith with Edinburgh. This continues to Gorebridge with a view to providing an important functional walking and cycling route along the A7 corridor. **No modification proposed.**

#### Cockburn Association

Disagree with proposed modification. In relation to management of shared networks, stakeholder leads and relevant partners are identified in the Action Plan. **No modification proposed.**

#### Cramond and Barnton Community Council

Figure 6.1 Strategic Walking and Cycling Routes identifies priority strategic functional and recreational routes. A proposed Edinburgh Orbital Strategic Functional Route has been represented in Figure 6.1, in addition to a proposed functional route linking Barnton/Cammo to Gogar/Maybury - this has been included in the proposed plan with a view to addressing congestion on these key transport corridors and providing linkages between public transport interchanges. Figure 6.1 identifies priority strategic functional and recreational routes – there will be some local or shorter active travel routes which may not be identified in this diagram. It is not the purpose of this section of the proposed plan to identify all routes. In the meantime, local routes will continue to receive support at LDP level. Paragraph 6.8 directs that ‘Local Development Plans will safeguard local routes and the route alignments needed to expand the local network.’ There is potentially a route which will be developed alongside Edinburgh LDP housing sites. **No modification proposed.**

#### Denholm and District Community Council

Disagree with proposed modification. Figure 6.1 Strategic Walking and Cycling Routes shows existing and proposed strategic functional and recreational routes and also identifies the Peebles to Kelso multi-use path. This has been included to increase connectivity between west and central Borders towns as well as providing a more sustainable route to the rail stations at Galashiels and Tweedbank. Leisure walking and cycling along the Tweed Valley will also be supported. Local routes will continue to receive support at LDP level. The plan also contains a clear directive that ‘Local Development Plans will safeguard local routes and the route alignments needed to expand the local network.’ **No modification proposed.**

#### Esk Valley Trust

Disagree with proposed modification. SESplan recognises the North Esk Way, and the River Esk Path has been included in the plan in recognition of its role as a cross-boundary recreational route, running from Musselburgh at the coast to Penicuik, with a separate branch along the South Esk to Gorebridge. Table 5 of the Green Network Technical Note contains a full list of strategic walking and cycling routes included in the proposed plan. **No modification proposed.**

#### Liberton and District Community Council

Disagree with proposed modification. Scottish Planning Policy (paragraph 277) already makes a clear policy guideline to Local Development Plans on disused railway lines and their potential for contributing to active travel networks. SESplan reflect the visions of Scottish Planning Policy and NPF3. The proposed plan also makes clear in paragraph 6.8 that ‘Local Development Plans will safeguard local routes and the route alignments needed to expand the local network’. SESplan would consider that this provides sufficiently clear guidance to member authorities. The former Waverley Line from Edinburgh to Loanhead is also safeguarded in the City of Edinburgh LDP and could potentially contribute to orbital bus proposals. **No**

**modification proposed.**

Linlithgow & Linlithgow Bridge Community Council

Disagree with proposed modifications. Consider that text in paragraph 6.4, which clearly relates to all development and gives a clear direction to reduce the need to travel by car, is sufficiently clear without need for modification. Paragraph 6.3 intentionally relates to housing. North-south and east-west routes through the Bathgate Hills serving the settlements of Linlithgow, Bathgate and Livingston were examined at Main Issues Report stage. These routes remain desirable in the longer term, but were not carried forward into the proposed plan owing to the routes being largely on road which does not fit with the strategic functional route definition. A full list of existing, planned and proposed/aspirational Walking and Cycling routes, along with reasoning for their inclusion or exclusion in the proposed plan following consultation during the Main Issues Report stage, can be found within the Green Network Technical Note (October 2016). In addition, West Lothian Council have published an Active Travel Plan 2016 – 21 which acts as a framework to identify priorities for investment and to increase opportunities for active travel across West Lothian. **No modification proposed.**

Midlothian Tourism Forum

Disagree with modification. Figure 6.1 identifies priority strategic functional and recreational routes. Local routes will continue to receive support at LDP level. Paragraph 6.8 (page 56) directs that 'Local Development Plans will safeguard local routes and the route alignments needed to expand the local network. SESplan member authorities will ensure that Local Development Plan Action Programmes and walking/cycling plans set out how these local routes will be delivered.' The plan also contains clear direction in Paragraph 6.3 which states 'Where new infrastructure is needed to enable this access, Local Development Plans will ensure that this is delivered ahead of, or as part of, new development.' **No modification proposed.**

The National Trust for Scotland

Disagree with modification. SESplan is intended to be a concise, visionary, map based document. SESplan would consider the Spatial Strategy, Placemaking Principles, Supporting Non-Car Travel and Walking and Cycling sections of the plan all provide a robust framework which promotes sustainable development and active travel. Active Travel is also a central theme in the plan's allocation of Strategic Green Network Priority Areas. **No modification proposed.**

North Berwick Community Council

Disagree with proposed modification. Figure 6.1 shows an existing recreational route connecting North Berwick with Edinburgh. Local networks are the responsibility of East Lothian Council and their LDP. **No modification proposed.**

RSPB Scotland

Disagree with modification. SESplan would consider these to be service rather than land use issues that should be assessed by the network operator in accordance with local levels of need and demand. **No modification proposed.**

Scottish Government

Disagree with proposed modifications. SESplan would consider the text in existing

paragraph 6.4, which relates to all development, would sufficiently address the points raised without need for modification. The requirement for member authorities to develop 'exemplar' walking and cycling friendly settlements is already referenced in NPF3 paragraph 5.14 – SESplan do not consider the need to repeat this in the proposed plan. It is not the role of SESplan to identify such settlements. **No modification proposed.**

Mr Charles Strang

Disagree with proposed modifications. It is not considered that 'higher development densities' is an overly technical phrase which requires additional information regarding its definition.

Figure 6.1 identifies priority strategic functional and recreational routes – there will be some local or shorter active travel routes which may not be identified in this diagram. It is not the purpose of this section of the proposed plan to identify all routes. Local routes will continue to receive support at LDP level. Paragraph 6.8 directs that 'Local Development Plans will safeguard local routes and the route alignments needed to expand the local network. SESplan member authorities will ensure that Local Development Plan Action Programmes and walking/cycling plans set out how these local routes will be delivered.' The Scottish Borders LDP also seeks to safeguard former railway lines in the Borders in light of their potential to be used for walking, cycling and recreational routes. **No modification proposed.**

**Infrastructure Delivery, Transport and New Housing Development**

Cockburn Association

Disagree with proposed modification. Vehicle emissions are not the sole factor in promoting the resource efficient location of housing land. Placemaking Principles should still apply to new development for reasons of resource efficiency, making best use of existing infrastructure, re-use of brownfield land and health benefits associated with an increase in active travel. Any increase in car based commuting may exacerbate congestion and lengthen journey to work times on an already stressed road network. **No modification proposed.**

Gullane Area Community Council

Disagree with proposed modification. The spatial strategy of the plan and Key Areas of Change South East outline areas identified for growth, including areas of strategic growth and long term growth corridors. The plan also contains a clear direction that all development will take into account the Placemaking Principles set out in Table 3.1, which includes the following guidelines: 'New development should be located near existing public transport hubs, or in locations where there are planned infrastructure projects to enable easy access to the public transport network'. Paragraph 6.3 goes on to issue clear direction which states 'Where new infrastructure is needed to enable this access, Local Development Plans will ensure that this is delivered ahead of, or as part of, new development.' **No modification proposed.**

Mactaggart & Mickel, Shawfair LLP; Shepherd Offshore (Scotland) Ltd

Disagree with modification. The second line of paragraph 6.3 clearly states: 'Where new infrastructure is needed to enable this access, Local Development Plans will ensure that this is delivered ahead of, or as part of, new development.' This has been written in the interests of preventing delays or bottlenecks in the provision of

essential infrastructure in tandem with housing development, and is intended to ensure that future housing development is well connected to local centres and centres of employment, including walking, cycling and public transport. **No modification proposed.**

Roslin and Bilston Community Council

Disagree with proposed modification. In relation to ensuring there is walking and cycling infrastructure in place before new development, The plan contains a clear direction that all development will take into account the Placemaking Principles set out in Table 3.1, which includes the following guidelines: 'New development should be located near existing public transport hubs, or in locations where there are planned infrastructure projects to enable easy access to the public transport network'. There is also a clear direction in paragraph 6.3 which states: 'Where new infrastructure is needed to enable this access, Local Development Plans will ensure that this is delivered ahead of, or as part of, new development.' In relation to funding, Strategic Walking and Cycling Routes are included in section B of Table 6.1 and therefore part of the potential list of projects that will be funded by the contributions framework. Details of delivery of individual projects is more appropriately addressed in the Action Programme. **No modification proposed.**

**Policy**

Corstorphine Community Council, Mrs Mirabelle Maslin, NHS Lothian Public Health and Health Policy, Roslin and Bilston Community Council

Disagree with proposed modifications.

Wording – plan's use of 'should' vs 'must': wording is intended to give member authorities a degree of flexibility where necessary. **No modification proposed.**

Corstorphine Community Council

Disagree with proposed modifications.

- Replacing Designing Streets with Welsh and London best practice guidance – SESplan will seek wherever possible to reference Scottish planning policy and guidance, and this will continue to be the point of reference until policy guidance is reviewed by the Scottish Government.
- Infrastructure for transport developments – there is clear direction at paragraph 6.4 which applies to all development, and states that 'Developments should be designed so that the density, use and layout helps reduce the need to travel by car. Developments should include clear and direct links to public transport nodes and good access to walking and cycling networks.'
- Modify definition of strategic functional routes, and delete reference to varying quality of recreational routes – following responses received at Main Issues Report stage, it was considered helpful to differentiate between functional travel routes (eg commuting to work, school, accessing shops) and more recreational routes.

**No modifications proposed.**

Mrs Mirabelle Maslin

Disagree with modification. The plan has made clear that all planning applications must be determined in accordance with the Development Plan, namely the Local Development Plan and the Strategic Development Plan (and any relevant

supplementary guidance). This is made clear in The Vision section of the plan (page 8). Specific statements relevant to development management are highlighted in bold and begin either 'Development should...' or 'Development must...' **No modification proposed.**

NHS Lothian Public Health and Health Policy

Disagree with proposed modifications.

Air quality – the plan already contains clear commitment to reducing travel by car, enabling more journeys by walking, cycling and public transport and reducing transport related carbon emissions. This is reflective of the visions of NPF3 and Scottish Planning Policy which set out the policy framework for reducing carbon emissions and adapting to climate change. Air quality was addressed in the Main Issues Report and SEA and has informed the spatial strategy of the proposed plan. It is not the purpose of the proposed plan to repeat context. **No modification proposed.**

24 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.]

<b>Issue 14</b>	<b>Strategic Transport Improvements</b>	
<b>Development Plan reference:</b>	<b>Pages 58-62, Paragraphs 6.9 to 6.15</b>	<b>Reporter: [Note: For DPEA use only.]</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Mr George Adam (037603)  Dr Robin Barclay (029264)  CALA Management Ltd (929806)  Campaign for Borders Rail (039962)  Ms Ailsa Carlisle (037414)  Mr John Clark (040286)  Cockburn Association (037249)  Corstorphine Community Council (929555)  Cramond &amp; Barnton Community Council (803443)  Damhead &amp; District Community Council (039328)  Dunbar Community Council (790195)  Mr Stuart Duffy (029738)  Edinburgh Association of Community Councils (040476)  Edinburgh Bioquarter Partners (037370)  Eskbank &amp; Newbattle Community Council (891202)  Daya Feldwick (768713)  Forth Ports Ltd (929573)  Mrs Frankish (040622)  Grange and Prestonfield Community Council (790304)  Mr Jon Grounsell (786916)  Gullane Area Community Council (037068)  Haddington and District Amenity Society (803807)  Hallam Land Management Ltd (039805)  Homes for Scotland (040551)  Lammermuir Community Council (039856)  The John Lewis Partnership (039926)  Liberton and District Community Council (790396)  Mactaggart &amp; Mickel Homes (038949)  Mrs Mirabelle Maslin (928549)  D and L McAuslan (040611)</p> <p>Mr William McCulloch (037293)  Dr Helen McKay (039852)  Midlothian Green Party (778339)  Moorfoot Community Council (906008)  Musselburgh Conservation Society (927996)  Network Rail (928260)  Mrs Constance Newbould (034296)  David Newbould (039331)  North Dunfermline CCs &amp; Halbeath TRA (930297)  Ocean Terminal Ltd (039645)  Park Lane (Scotland) Ltd (039990)  Peebles and District Community Council (039578)  Peebles Community Trust (810911)  Penicuik Estate/Penicuik House Preservation Trust (037926)  Prestonpans Community Council (039835)  PSL Land Ltd (039196)  Queen Margaret University (040312)  Rosewell and District Community Council (790523)  Roslin and Bilston Community Council (790524)  Crawford and Douglas Ritchie (040552)  Scottish Government (034404)  Scottish Natural Heritage (790587)  Shawfair LLP (039940)  Shepherd Offshore (Scotland) Ltd  Mr Julian Siann (024823)  South West Communities Forum (038954)  Mr Charles Strang (907037)  Transform Scotland (039136)  Trinity Community Council (039995)  Wallace Land Investment &amp; Management (930071)</p>		

<b>Provision of the Development Plan to which the issue relates:</b>	<b>Paragraphs 6.9 to 6.15 and Proposed Plan Transport Appraisal</b>
<b>Planning Authority's summary of the representation(s):</b>	
<p><u>Mr George Adam</u> M9 junction 3 needs to be implemented now. Plan needs to consider local road infrastructure to aid housing development and solve town centre congestion and air pollution.</p> <p><u>Dr Robin Barclay</u> Consider of ferry connections (passenger/car) to/from Europe.</p> <p><u>CALA Management Ltd</u> Pressures on the A70 from traffic movement and the restricted ability to expand the road can be actively reduced through development proposals. Provision of a relief road for the A70 as part of wider development proposals would have major environmental benefits for the villages currently affected by traffic and could be delivered in association with development. Concerned about the possible misconception that Curriehill Station is peripheral. A development corridor can encourage improvements.</p> <p><u>Campaign for Borders Rail</u> Support new development focused along the Borders Railway corridor and consider that development will lead to need for improvements to services and increased frequency necessitating double-tracking of the railway. Support Borders Rail extension.</p> <p><u>Ms Ailsa Carlisle</u> The A701 relief road should not be in the SESplan as it is not of strategic regional importance. Other reasons for removal are: the Midlothian Local Development Plan (LDP) in which it is contained is not adopted, it will cause significant environmental impact; it will dissect Damhead, an area characterised by small holdings with a rural business community; it will result in the loss of prime quality agricultural land which is not in line with sustainable development principles; and the high cost of building the relief road will far outweigh any benefits. Instead the whole A701 corridor should be examined in line with reducing car travel. Widen it, with a dedicated cycle route from Gowkley Moss with access to the Bush for employees.</p> <p><u>Mr John Clark</u> Does not support inclusion of A701 Relief Road for the following reasons: It is not of strategic importance, its inclusion is premature as the Midlothian LDP is not adopted; and it will not relieve congestion but increase traffic on the congested A720. It should not be marked as committed in table 6.1 as the route is still very uncertain and has many potential engineering difficulties with cost implications.</p> <p><u>Cockburn Association</u> Support: tram extension to Newhaven but consider using ground feed power systems to avoid visual impact of power lines; A720 improvements, especially Sheriffhall, subject to minimal green belt land take. Suggest addition of A720</p>	

improvements at A8 and M8 junctions, which are congested. Resources for road maintenance must be increased as many roads in Edinburgh are poor quality. No mention is made of how safeguarded land is to be managed (paragraph 6.13). Every effort should be made to avoid land blight by seeking positive options that could benefit local communities. Concern is raised over A701 Relief Road and A702 Link, Dunfermline Northern Relief Road and Western Distributor Road and Orbital Bus due to loss of green belt land and green belt impacts. Any distributor roads around Dunfermline should use minimal green belt land and visual impacts of these roads should be mitigated as much as possible

Need for periodic review of best use of the road infrastructure in light of increased road traffic arising from improvements to the road network. Questions whether proposed traffic flows on the new Forth Crossing and existing Forth Road Bridge may need to be re-assessed in the event of increasing volumes of traffic. Suggests potential heritage and tourist appeal of re-opening of car ferry between North and South Queensferry.

#### Corstorphine Community Council

Concerned about committed and planned development proposals in West Edinburgh at Gogar, Maybury, Barnton and St. Johns Rd in the village of Corstorphine and subsequent impacts on atmospheric pollution, noise and general degradation of the living environment. Various reports of proposed amelioration measures have been prepared suggesting road improvements and new traffic lights etc. and 'Green Networks' to encourage walking and cycling and limitations on car use and parking etc. but it is generally expected that these measures will prove largely insufficient.

#### Cramond & Barnton Community Council

Support cross boundary and other strategic projects but 'Improvements associated with trunk road approaches to Edinburgh ....' should be included under Section 'A. Strategic Projects 2018-2030' not Section B. Major improvements to junctions and relief of pressures on A90 and A8 approaches to Edinburgh and corridors within the City boundary are vital

Representation seeks that any proposals for increased capacity at Edinburgh Airport should recognise noise and pollution impacts for those most affected by close vicinity to flight paths, particularly for residents at Cramond and Barnton.

#### Damhead & District Community Council

A701 Relief Road and A702 Link road are not strategic and should not be included in the Strategic Development Plan (SDP). The Midlothian LDP is not yet adopted. There is no benefit to the A701 relief road taken against the cost to the community and loss of prime agricultural land. These considerations are disproportionate to any benefit to traffic congestion. Would affect a vibrant business community. Will not achieve the intended goal as it does not link the A701 with the bypass. Any intended benefit for accessing the Bio Campus or Bush Estate could easily be achieved in a much more effective manner. The importance of this area cannot be underestimated as it gives the opportunity of green pathways from built up areas to the Pentland Hills. The constraints of this proposed road due to adverse ground levels and ground conditions have been largely ignored. The Council despite

having a consented scheme for more than 8 years have failed to realign the A701. The suggested route bypasses the Park and Ride at Straiton therefore reducing the benefits of the P&R facility. No satisfactory transport appraisal carried out to warrant a new relief road. The only understandable reason for its inclusion to any plan would be to create a boundary up to which new housing could be built in order to pay for itself. A701 relief road contrary to Green Network principles. This in essence would not be a "relief road" at all. The A701, A702 and the A703 from Penicuik to the City Bypass are more than adequate. Improvements should be made to existing roads and a roundabout at Hillend and Easter Bush along with a Park and Ride at Hillend would be a more suitable solution.

#### Dunbar Community Council

Support reopening of East Linton rail station. Needs to be an increase in parking at Dunbar station. Support dualling of A1 and need for junction improvements.

#### Mr Stuart Duffy

SDP needs to include transport improvements in Western Fife including: Dualling the road between Kincardine and Dunfermline as a 'missing link' in the road network offering a faster and safer option for traffic driving North across the Queensferry Crossing through Fife to Central Scotland. This is a faster route from Fife to Glasgow than using the Queensferry Crossing route, which, when opened, will add extra time to a commute from Dunfermline to Glasgow than using the Kincardine route. Commitment to new stations at Valleyfield, Newmills and Kincardine on Dunfermline - Alloa line to benefit tourism. Many Fifers now commute to Glasgow and have to rely on road or bus links at the moment. Make it easier and faster for commuters in Fife to get to the West.

#### Edinburgh Association of Community Councils , Grange and Prestonfield Community Council

Support Strategic Transport Improvements but cannot only be achieved with heavy rail and buses. Suggest study early in plan period in the potential for using parts of the rail network for light rail with new links as needed between sections and branches to new growth areas. This study should also look at investment funding possibilities and would enhance longer term sustainable objectives.

#### Edinburgh Bioquarter Partners

Concern that A720 improvements are not a priority for the 2018-2030 period by not including them in section A of table 6.1. Funding and delivery of A720 improvements should be prioritised during the 2018-2030 period, especially as the contributions framework will not be produced until 1 year after plan approval. Distinction between section A and Section B is unclear.

#### Eskbank & Newbattle Community Council

Concern raised over inclusion of A701 Relief Road as it has not been subject to a traffic study and early analysis indicates that this would give almost no relief to congestion.

#### Daya Feldwick

Does not support inclusion of A701 Relief Road for these reasons: It is not of strategic importance; its inclusion is premature as it is not in the adopted Midlothian

LDP; it will not relieve congestion but allow vehicles to travel quicker between congested areas; Prime Quality Agricultural Land will be lost; it will destroy community of Damhead; SYSTRA study over estimates benefits and underplays significant negative impacts on air quality, water quality, drainage and flood defence, biodiversity and habitats, landscape, visual amenity, agriculture and soils and cultural heritage.

Forth Ports Ltd

Don't support routing of transport proposals through Forth Ports operational estate.

Text in paragraph 6.14 does not fully recognise the extent or requirements of modern port operations and considers this may be detrimental to future development.

Mrs Frankish

Object to the inclusion of the A701 Relief Road these following reasons: It is not of strategic importance; its inclusion is premature as it is not in the adopted Midlothian LDP; the road will serve only to encourage further congestion and road traffic and will not address the problems of congestion that are a result of an outdated bypass system; it is inconsistent with the Damhead Neighbourhood Plan; Prime Quality Agricultural Land and green belt will be lost; and it will dissect the forward thinking community of Damhead.

Mr Jon Grounell

Plan for a Borders Rail extension to Berwick upon Tweed and a High Speed Rail (HSR) link from West Edinburgh, including airport, directly through the Borders to Newcastle upon Tyne, with an interchange where the two cross. Would save 30 miles off journey.

Does not consider tram extensions effective in facilitating growth and modal shift.

Gullane Area Community Council

Considers transport interventions identified to be of particular importance for East Lothian.

Haddington and District Amenity Society

Should not base any housing allocations on Strategic Longer Term Transport Projects because these may not be delivered. Development should only be based on committed section A schemes.

A study should be commissioned into a rail link to Haddington should be introduced, more than just reliance on buses.

Development should be close to public transport and centres. Ease of movement and therefore transport interventions are fundamental to the success of the plan and there must be a commitment to infrastructure improvements in East Lothian.

Hallam Land Management Ltd.

Cross boundary contributions will fund mitigation interventions on A90 bus corridor.

Lammermuir Community Council

Reston Station should be prioritised and the extension of the Borders Railway scoped. Dualling sections of the A1 north of Berwick should be a priority.

The John Lewis Partnership

Support measures to improve movement in Edinburgh, including Tram extension with a new stop at Picardy Place.

Liberton and District Community Council

Support section as the road network has no capacity for increased development proposed. The aims probably could only be achieved by being bolder and promoting investment in improved facilities such as new and improved bus and rail/light rail / tram services plus additional park and ride facilities. Current public transport infrastructure and services also need to be improved.

Mactaggart & Mickel Homes , Shepherd Offshore (Scotland) Ltd

Paragraph 6.13 could be more forceful and provide more direction/guidance to stakeholders and safeguarding land.

Mrs Mirabelle Maslin

Considers that roads are already congested and transport interventions are not described fully enough.

Paragraphs 6.9 to 6.13 - Much of this should be activated before work begins on the many more 1,000s of dwellings.

Table 6.1 The concept of a Dunfermline Northern Relief Road and a Western Distributor Road is flawed when considered in the face of the need to encourage non-car transport. Question how it will be funded. The plan should include a requirement to increase capacity of passenger trains between Dunfermline and Edinburgh.

The so-called A701 relief road is ill-conceived. Its impact will be destructive to the environment, it will be of high financial cost, and it will achieve almost nothing in terms of improving traffic flow. Please investigate widening and improving the road to Bush from Gowkely Moss Roundabout as a viable objective, together with the possibility of it connecting with the proposed A702 link.

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

D and L McAuslan

The A701 Relief Road in the coming period 2018-2030 should be re-evaluated for the following reasons: the proposal is in its infancy and we would question the viability of the land to be used; while much of the higher ground land is of prime quality agricultural land, there is a section which hosts a thriving population of marsh grasses and therefore to build a dual carriageway across such land will be costly and likely to cause problems; many of the objectives described in this proposed SESplan look to a cleaner, greener future and this proposal does not accord with these; the land to the west of the current A701 could certainly benefit

from further walkways, cycle ways and public transport; is contradictory to statements in supporting non car travel section of plan; and it does not comply with the vision for 2038 thriving, successful and sustainable. In order to preserve a unique area of green belt. The current area is comfortably in alignment with many of the objectives of the placemaking principles. However, the blight that would be caused by the A701 Relief Road would destroy a community and further increase the congestion problem, which ultimately is against many attempts to reduce our carbon footprint. It should be replaced with investment into making public transport easier and have even more people cycling and walking to work. This relief road should be suspended, as there are a number of supplementary guidance, transport options and appraisals required until due consideration of the validity of the project is completed. Land for housing has already been identified without the further work undertaken to confirm the validity of the project.

Mr William McCulloch

Consider that the plan overlooks the arterial nature of the B7026 and its potential to ease development pressure on, and traffic flow within Penicuik and suggest it should be considered part of the A701 corridor. Should be recognition that certain local plan policies hamper the implementation of the Proposed Plan in the area of the B7026.

Dr Helen McKay

A701 'relief' road should not be included in SDP. Public transport should be improved from the major commuter towns and villages to a much wider range of destinations within the city. Not justified in terms of robust evidence or improving traffic flows as commuters don't travel to the east and therefore the 'relief' road would provide almost no benefit for commuters or local resident. It would also result in the loss of green belt and prime quality agricultural land. It is not strategic, not in an adopted LDP and does not cross a local authority boundary and therefore should not be in the SDP. It would also split the community of Damhead. Park & Rides should be further out of town to reduce the number of vehicles using the A701, A702, and A703. Linked to the improvements in public transport, it is urgent to create safe cycle paths and walkways for people who would like to use more sustainable and healthy forms of transport from the South and Southeast into Edinburgh and vice versa. Ideally these would be well separated from motorised vehicles.

Midlothian Green Party

Question the basis for some transport proposals. Consider that it is not clear that any potential route for the tram extension has been identified and as a result the Proposed Plan is likely to deliver the additional road but not the tram. Consider that there will be a need to extend the double track sections of the Borders Railway. The A701 Relief Road should be removed from the Plan and replaced with a safeguarded route for the tram extension to the Bush. Capacity improvements on the Borders Railway should be prioritised.

Moorfoot Community Council

Paragraph 3.7 acknowledges that increased traffic congestion is an issue but the only proposed solution to this is 'key strategic transport improvements', rather than reducing travel demand by locating housing closer to places of work 'and vice

versa'. The Growth Corridors strategy relies heavily on the Borders Railway but this line already has significant capacity problems, and improvements to the existing line are not listed in Table 6.1 (Strategic Transport Improvements). There needs to be prioritisation through SDP2 and City Deal to extending the double track sections of the line. Without this, the aim of reducing commuting by road to Edinburgh will fail resulting in greater road congestion.

#### Musselburgh Conservation Society

Essential that transport infrastructure needed to justify and support development is delivered if our region is not to grind to a halt with all the growth proposed in this plan. There should be a simple rule: 'No essential supporting infrastructure, no development'. Transport Interventions need to be committed not potential or longer term to support planned development. This includes Sheriffhall Upgrade, East Coast Mainline 4 Tracking, and Edinburgh Cross-Rail.

Growth in the corridor to Penicuik will not be adequately served by public transport without a dedicated and fast public transport link. The former rail line to Bilston is could be utilised.

#### Network Rail

Clarify inclusion of Edinburgh Cross Rail Services as there are already cross rail services from North Berwick and Tweedbank. Need to Clarify what East Coast Mainline Ongoing and Planned Improvements are. Clarify that Edinburgh-Glasgow Rail Improvements is EGIP Project. Question inclusion of four line section between Blindwells and Drem when Network Rail Scotland Route Study indicates option between Prestonpans and Drem. Support aims of paragraphs 6.10 and 6.13.

#### Mrs Constance Newbould

Against the inclusion of the A701 relief road for the following reasons: it will not provide any relief for the A701; it will result in the loss of prime quality agricultural land and destroy green belt; it will contravene the Damhead Neighbourhood Plan; upgrading 3 existing roads are required; contravenes SESplan vision for healthier communities; and Bush commuters already use the A702 and then the link road from Easter Howgate to the Bush estate. Instead improvements should be made to A702 and A703, increased bus provision from Penicuik and West Linton and deliver the park and ride at Hillend.

#### David Newbould

A701 realignment will not relieve traffic congestion as there is no proposed extra housing being built along its route. Widening would cause least disruption, maintain the landscape and could accommodate cyclists. Para 3.18 does not mention new roads, only upgrades and improvements.

#### North Dunfermline CCs & Halbeath TRA

Nothing is done to test the accuracy of transport needs noted by the Local Authority. Acceptance of these needs without independent assessment of the data disserves communities. Halbeath Rail Halt cannot go ahead due to live pipelines.

#### Ocean Terminal Ltd

Seek clarification of timescales for delivery of the tram.

Park Lane (Scotland) Ltd.

Contributions framework will mitigate impacts on A8 bus corridor with park and ride sites. These should be on figure 6.2 reflecting Local Transport Strategy.

Peebles and District Community Council

Does not address cross region connectivity, particularly in the Scottish Borders. The East-West A72 is not fit for purpose. Future economic, including tourist, development will exacerbate significant failures in current provision. The Borders Railway does not currently maximise the opportunity of rail connectivity.

Peebles Community Trust

Want to see more explicit reference to improvement in east-west transport links, notably in the Scottish Borders, where current provision is poor. The importance of these links is over-looked with emphasis places on the spoke transport corridors leading in and out of the centre of the region.

Penicuik Estate/Penicuik House Preservation Trust

Tram extension to Penicuik and Dalkeith should be included because: it was included and positively appraised as part of Strategic Transport Projects Review (STPR); it performed well against key objectives including public transport attractiveness and capacity, interchange possibilities and maintaining a labour market within a 60 minute commute. Also question why tram extensions are planned for well connected by rail locations of Newcraighall and QMU rather than large settlements of Dalkeith and Penicuik which don't have sustainable link.

Prestonpans Community Council

Transport links connecting East Lothian to Edinburgh and the M8 corridor are operating at beyond capacity. There are no funded proposals to improve the North Berwick line, A1 or City Bypass.

PSL Land Ltd

Proposed Plan should be amended to reflect the current status of the proposed A701 Relief Road and A702 Link. The indicative alignment shown within Figure 6.2 is not a committed development; is subject to detailed design, environmental assessment and has no designated funding in place to secure its delivery. The alignment shown would have the potential to impact on the Pentland film studio development, deemed to be of national importance, and therefore jeopardise job creation and investment. The factual position of the Road should therefore be reflected within an amended Table 6.1.

Queen Margaret University

A1 Junction at QMU should be prioritised to unlock development near QMU and 4 tracking brought into section A of table 6.1.

Rosewell and District Community Council

Support section but long journey times and circuitous routes do not encourage bus commuting to Edinburgh, increasing use of private car.

#### Roslin and Bilston Community Council

Midlothian suffers from urgent traffic problems that need solutions before any more houses are built. The A701 is inadequate for any kind of traffic volume and in poor repair. The A720 is gridlocked on a regular basis. The proposed A701 relief road will not solve any problems. Alternatives need to be considered.

#### Crawford and Douglas Ritchie , Homes for Scotland

Support for directing growth into and along public transport corridors, but finds plan is deficient in detail to show how infrastructure will be implemented for Long Term Growth Corridors beyond 2030, particularly in the run up to 2030.

#### Mr Julian Siann

Concern that tram extension to Newhaven will be of marginal benefit. No funding is in place and that it cannot be funded through development as there are not enough wealthy developers to fund it. The versatility of the existing bus services and the amenities provided on the waterfront will determine whether development goes ahead.

#### Scottish Government

The Halbeath Rail Halt and Levenmouth Rail Link should be moved to Strategic Longer Term projects as neither of these projects have the relevant appraisals required to support their inclusion nor is it certain that they will be concluded in time for them to come forward by 2030. Including them does not meet requirements of Scottish Planning Policy (SPP) paragraph 277.

Remove reference to any Edinburgh cross-rail project within Section B. This is not an option being tested within the cumulative cross boundary appraisal and Transport Scotland is not aware of any form of appraisal currently being undertaken.

Figure 6.2 should be referenced in the text under Strategic Transport Improvements. Figure 6.2 should be made clearer by adding distinction between projects including differing levels of new or improved, commitment, delivery and funding as set out in Table 6.1. The figure itself lacks critical information and a suitable key.

Modify paragraph 11 to indicate that projects listed in section C of Table 6.1 are aspirational at this stage and the further appraisal work is required on their rationale, viability and deliverability. This would more accurately reflect the status of the schemes and clearly set that further work is required on the deliverability in accordance with SPP paragraphs 274, 275 and 277.

SDP2 Transport Appraisal does not meet requirements set out in SPP paragraph 274 and 275. The Transport Appraisal undertaken for the SDP fails to recognise, or identify transport interventions required to support delivery of the impact of the spatial strategy given the longstanding issues with SDP1, and does not identify specific infrastructure measures to mitigate the SDP2 allocations. The TA effectively defers to the SDP1 focussed Cumulative Cross Boundary Study (CBS) to provide such details and information and fails to clearly identify the mitigation measures required on the trunk road network to support delivery of the SDP

allocations, and how they will be funded and delivered. SDP2 TA report fails to identify the infrastructure required to deliver the SDP strategy, which, given the lack of information on this within SDP1, is a significant issue. Overall the Appraisal states "the strategic impacts are widely distributed and relatively minor", yet the evidence presented suggested there are several junctions along the A720 trunk road which are forecast to exceed capacity with no mitigation measures identified. TA work undertaken for SDP2 requires providing a greater level of detail. It is not appropriate that subsequent LDPs should be left to identify mitigation measures, as currently included on page 33. SPP expects that planning authorities appraise the impact of the spatial strategy on the transport network in line with Development Planning and Management Transport Appraisal Guidance (DPMTAG). Furthermore, development plans should identify any required new transport infrastructure. It is therefore not compliant or practical to delay the requirement for identifying SDP2's potential impact and any necessary mitigation measures to a later date and to state this will be brought forward through LDPs.

#### Scottish Natural Heritage

Need for cross referencing on Table 6.1 and Figure 6.2 of related transport and active travel projects, including Orbital Bus. A801 improvements should include walking and cycling infrastructure.

#### Shawfair LLP

Imperative that constraints to transportation are actively addressed without further delay. Should go further to emphasise focus on these areas at LDP level.

#### Shepherd Offshore (Scotland) Ltd

Imperative that constraints to transportation are actively addressed and the SDP ensures a joined up approach between authorities and wider stakeholders.

#### South West Communities Forum

Public transport investment will not prevent private car use. Transport charges increase development costs. Trams work when masterplanned not on existing settlements. Homes, workplaces, shopping and leisure facilities closer together reduce travel.

#### Mr Charles Strang

The need for a safeguarded route from Tweedbank to Berwick should be identified. Cross boundary transport (paragraph 3.7) should include references to England and in particular to the Pennine Way.

Do not consider approach outlined in paragraph 6.15 to be in line with the principles of sustainable development. Suggests inclusion of an Environment section of the proposed plan.

#### Transform Scotland

Considers that improved public transport facilities will be essential to Blindwells and support proposed station at East Linton.

Increasing importance of Shawfair Station likely to lead to demand for higher frequency services necessitating double tracking of the railway.

Opposed to some of the road proposals listed this section - Dunfermline Northern Relief Road and Western Distributor Road, A701 Relief Road and A702 Link and A1 Dualling. These projects are in conflict with National Performance Framework priorities on transport, climate change, and equalities

Include following in proposed plan: Dunfermline Rail By-pass; Reinstatement of the railway from Cowdenbeath north towards Kinross and Bridge of Earn.

Trinity Community Council

Need to undertake a strategic review of transport needs and identify and resolve cross boundary issues within North Edinburgh. Ferry Road is beyond capacity.

Wallace Land Investment & Management

Consider that enhancements to the park and ride at Drem station should be expressly stated.

**Modifications sought by those submitting representations:**

Mr George Adam

Table 6.1 - Insert statement that M9 J3 should be implemented as a priority.

Dr Robin Barclay

Modify paragraphs 6.14/6.15 to add reference to ferry connections to and from Europe.

Campaign for Borders Rail

Table 6.1 - Include requirement for double-tracking of the Border Railway from north of Shawfair to Portobello Junction.

Ms Ailsa Carlisle

Replace A701 relief road and A702 link with A701 road and cycleway improvements.

Mr John Clark

Table 6.1 - Delete A701 Relief Road and A702 Link. Failing that, include incorporation of "further Appraisal" in Table 6.1.

Cockburn Association

Paragraph 3.18 - Clearly set out the case for and against the Damhead relief road.

Paragraph 6.9 - Insert following statement 'Review ground feed power systems for the tram operation so that expansion of the tram system may consider this low visual impact option'

Paragraph 6.9 - Insert following statement 'All transport improvements should minimize land take from sensitive areas (e.g. green networks/green belt) and require high quality mitigation measure'

Paragraph 6.9 - Insert following statement 'Improve the design of Park & Rides sites to increase the amount of tree and shrub planting'

Review sustainability of all aspects of traffic flows to and from Fife.

Paragraph 3.24 - Include a statement to monitor the effectiveness of current traffic

proposals for the Forth road crossings and implement changes if and when these may be required.

Paragraph 3.26 - Include a requirement for a high standard of landscape design for the Dunfermline Northern Relief Road in order to mitigate adverse effects upon the Dunfermline green belt in this area.

#### Cramond & Barnton Community Council

Table 6.1 - Modify by moving "Improvements associated with trunk road approaches...." to under section A Strategic Projects 2018-2030.

Paragraph 6.15 - Modify that any increase in capacity at Edinburgh Airport should recognise noise and pollution impacts for those most affected by close vicinity to flight paths, particularly for residents at Cramond and Barnton.

#### Damhead & District Community Council , Roslin and Bilston Community Council

Table 6.1 and Figure 6.2 - Remove A701 Relief Road and A702 Link. Replace with A701, A702 and A703 upgrades.

#### Mr Stuart Duffy

Figure 6.2 and Table 6.1 – Modify to include: Stations at Valleyfield, Newmills and Kincardine on the Dunfermline - Alloa Line Dualling the A985 between Dunfermline (A823M) and Kincardine

#### Edinburgh Association of Community Councils , Grange and Prestonfield Community Council

Include commitment to undertaking light rail study early in plan period.

#### Edinburgh Association of Community Councils

Paragraph 3.16 – Insert "Early in the plan period the opportunity should be taken to review the benefits of re-introducing passenger traffic on the South Suburban rail line and integrating this with tram/light rail enhanced infrastructure"

#### Edinburgh Bioquarter Partners

Table 6.1 - Move "A720 Improvements...." from section B to section A

#### Eskbank & Newbattle Community Council , D and L McAuslan , Daya Feldwick , Dr Helen McKay , Mrs Constance Newbould , Mrs Frankish , Mrs Mirabelle Maslin , Ms Ailsa Carlisle , Transform Scotland , David Newbould

Table 6.1 and Figure 6.2 - Remove A701 Relief Road and A702 Link.

#### Daya Feldwick

Undertake an A701 corridor study looking at all transport modes which should follow SESplan Supporting Non-car travel principles and SEStran Transport Hierarchy.

#### Forth Ports Ltd

Paragraph 6.14 – Modify as follows "Freight by rail, road, sea and air plays an essential role in the regional economy. The freight handling capacity of ports around the Forth, including Rosyth, is essential for North Sea shipping routes. LDPs will support Increased Freight Handling Capacity of Ports on the Forth, the requirements of modern operations to ensure that they provide for global

requirements and the need for associated infrastructure, safeguarding land where appropriate.

Modify subject heading National Transport Developments (page 62) to read: International and National Transport Developments.

Mrs Frankish

An assessment of alternative transport options to the A701 relief road that do not compromise rural and greenbelt communities must be undertaken.

Mr Jon Grounell

Table 6.1 and Figure 6.2 - Include Borders Rail extension to Berwick

Table 6.1 and Figure 6.2 - Include HSR link from West Edinburgh to Newcastle through Borders, with Borders Railway interchange.

Commission study on effectiveness of tram system.

Gullane Area Community Council

Prioritise major upgrades to the Edinburgh City Bypass and improvements to the strategic road and rail networks and local road networks.

Haddington and District Amenity Society

No modification is specified, representation indicates....

Paragraphs 6.9 to 6.13 - Include commitment to study into dedicated rail link to Haddington.

Lammermuir Community Council

Insert statements that the following projects should be prioritised: Dualling sections of the A1 north of Berwick; Reston Station and scoping study for Borders Railway Extension.

Mactaggart & Mickel Homes , Shepherd Offshore (Scotland) Ltd

Paragraph 6.13 - provide more direction/guidance on how stakeholders can come together to align programmes and provide a coordinated investment approach.

Mrs Mirabelle Maslin

No modification is specified, representation indicates...

A list of specific transport interventions and timescales should be included.

Table 6.1 and Figure 6.2 - Remove Dunfermline Northern Relief Road and West Distributor Road.

Table 6.1 and Figure 6.2 - Include investigate widening and improving the road to Bush from Gowkely Moss Roundabout and possibility of connection to A702 Link.

Table 6.1 and Figure 6.2 – Include commitment to increasing track capacity of the Borders Railway and to increase parking facilities at stations.

D and L McAuslan

If not removed altogether, then the A701 Relief Road should be moved from Strategic Projects 2018 - 2030 in Table 6.1 (Strategic Transport Improvements) to Strategic Longer Term Projects, beyond 2030.

Mr William McCulloch

Include the B7026 Auchendinny to Howgate road as part of the A701 corridor.

#### Dr Helen McKay

Include reference to improved public transport routes from south Midlothian.  
Include Park & Rides further out of town to reduce the number of vehicles using the 701,702, and 703.

Include safe cycle paths and walkways in Midlothian.

#### Midlothian Green Party

Figure 6.2 and Table 6.1 - Remove A701 Relief Road and A702 Link. Replace with safeguarded tram route to the Bush.

Include statement that capacity improvements on Borders Railway should be prioritised.

#### Moorfoot Community Council

Table 6.1 - include commitment to upgrade the capacity of the Borders Railway, including double track sections.

#### Musselburgh Conservation Society

Table 6.1 - Sheriffhall Junction Upgrade should be committed and moved to section A. Table 6.1 - Edinburgh Cross-Rail services should be committed and moved to section A. Table 6.1 - East Coast Mainline 4 tracking should be committed and moved to section A. Table 6.1 and Figure 6.2 - Add dedicated transport link along the growth corridor to Penicuik

Include statement that no allocations should be based on potential or long term project unless there is certainty that they will be delivered.

#### Network Rail

Table 6.1 - Clarify entries for East Coast Mainline Ongoing and Planned Improvements and Edinburgh Cross Rail Services.

Table 6.1 Add EGIP after Edinburgh- Glasgow Rail Improvements.

Table 6.1 Section C - Modify to read East Coast Mainline: formation of four line section of track between Prestonpans and Drem, including new station and over bridge for Blindwells.

#### Mrs Constance Newbould

Increase bus provision from Penicuik and West Linton and deliver park and ride at Hillend.

Table 6.1 - Upgrade A702 with a new junction at the north end of the Scientific Park at Easter Bush.

Table 6.1 - Upgrade the A703 with a new cycle way.

Table 6.1 - Provide a link from the Carnwath area near the A74 to come round the west side of the Pentlands and connect to the west side of the A720 near Hermiston Gait to link with the new infrastructure in the Proposed Plan.

#### David Newbould

Table 6.1 - Include widening of the A702 as it approaches the A720 around the tight bends on the side of the Pentland Hills.

Table 6.1 - Include widening of A701 from the Gowkley Moss Roundabout to the dual carriageway at Straiton.

Park Lane (Scotland) Ltd.

No modification is specified, representation indicates...  
Figure 6.2 - Include A8 bus and park and ride improvements.

Peebles and District Community Council

Insert a statement that a plan for cross region transport should be developed including trunking of A72.  
Extending the Borders Railway to Carlisle should be considered a priority and further sections of "twin track" constructed to upgrade and improve services are undertaken immediately.

Peebles Community Trust

No modification specified, representation indicates...  
Table 6.1 and Paragraph 6.9 - Include reference to improvement in east west transport links, notably in the Scottish Borders.

Penicuik Estate/Penicuik House Preservation Trust

Table 6.1 - Modify Tram extensions line to state "Tram extensions: York Place to Newhaven\*; City Centre to Edinburgh BioQuarter, Dalkeith and Penicuik\*; Newhaven to Granton\*; Roseburn to Granton\* and Ingliston to Newbridge\*"

Prestonpans Community Council

No modification specified, representation indicates...  
Table 6.1 - Include improvements to the North Berwick rail line.

PSL Land Ltd

Table 6.1 - Insert symbols for Non Committed and Further Appraisal Required for A701 Relief Road and A702 Link.

Queen Margaret University

No modification is specified, representation indicates ...  
Table 6.1 - Prioritise A1 Junction Improvements at QMU  
Table 6.1 - Move East Coast Mainline four tracking to section A

Rosewell and District Community Council

No modification is specified, representation indicates....  
Insert statement requiring bus routes to be direct with shorter times.

Crawford and Douglas Ritchie , Homes for Scotland

No modification specified, representation indicates....  
More detail required on how infrastructure will be implemented for Long Term Growth Corridors beyond 2030.

Scottish Government

Table 6.1 - Move Halbeath Rail Halt and Levenmouth Rail Link from section A to section C.  
Table 6.1 - Delete Edinburgh Cross-Rail Services  
Paragraph 6.9 - Insert statement that projects identified in table 6.1 are shown on Figure 6.2.  
Figure 6.2 - Clearly annotate to show distinction between new or improvements

and levels of commitment delivery and funding as set out in Table 6.1.

Paragraph 6.11 - Modify to read "Section C of Table 6.1 sets out aspirational strategic longer term projects that may not be delivered in this plan period but are supported by SEStran and SESplan member authorities. They have the potential to improve journey times, reduce congestion, support economic growth and increase the accessibility of towns. However, those marked § will require further appraisal work to determine their rationale, viability and deliverability"

#### Scottish Natural Heritage

Table 6.1 - include walking and cycling infrastructure improvements alongside A801 Improvements.

Table 6.1 - Include Orbital Cycle Route alongside Edinburgh Orbital Bus and Associated Park and Ride.

#### Shawfair LLP , Shepherd Offshore (Scotland) Ltd

Include direction that LDPs actively seek to deal with transport infrastructure constraints.

#### Shawfair LLP

Actively address transport constraints on main arterial routes to and between Edinburgh and its fringes to the west, south and east

#### Mr Charles Strang

Table 6.1 and Figure 6.2 - safeguard Borders Rail extension to Berwick

Paragraph 3.7 - Modify to include references to England and in particular to the Pennine Way.

Paragraph 6.15 - Modify to either i. make a commitment to reducing internal flights and halt Airport expansion; or ii. Provide clearer information on environmental impacts of Airport expansion.

#### Transform Scotland

Table 6.1 and Figure 6.2 - Delete Dunfermline Northern Relief Road and Western Distributor Road

Table 6.1 and Figure 6.2 - Delete A1 Dualling

Table 6.1 – Include following proposals: Dunfermline Rail By-pass; Reinststate the railway from Cowdenbeath north towards Kinross and Bridge of Earn as a strategic cross boundary transport improvement.

#### Trinity Community Council

No modification specified, representation indicates...

Strategic transport improvements should be identified in North Edinburgh and included within Table 3.1.

#### Wallace Land Investment & Management

Table 6.1 – Include under section A "Enhanced park and ride facility at Drem Station"

## Summary of responses (including reasons) by Planning Authority:

### **City of Edinburgh Issues and Transport Infrastructure**

#### Cala Management

There are no current proposals for an A70 relief Road and no level of planned or proposed development that would require it. Curriehill station is currently infrequently served by services to Glasgow and Edinburgh. **No modification proposed.**

#### Cockburn Association

Specification of the power systems for the tram is not an SDP matter. **No modification proposed.**

#### Corstorphine Community Council

Transport impact mitigation options for West Edinburgh are set out in the Edinburgh LDP and its accompanying Action Programme. The need for additional development in West Edinburgh will depend on housing land estimate during the production of the next Edinburgh LDP and that plan's analysis and regeneration strategy. **Noted.**

#### Edinburgh Association of Community Councils , Grange and Prestonfield Community Council

The Cross Boundary Study and Network Rail Scotland Route study are considering improvements to the rail network based on future populations in the region. The South Suburban Line is safeguarded in the Edinburgh LDP but there is no consideration of its use for passenger services at this time. **No modification proposed.**

#### Mr Jon Grounell

Studies reviewing the usage of the tram have been undertaken and will influence future decision on tram extensions. **No modification proposed.**

#### The John Lewis Partnership

The exact location of trams stops is a matter for the Tram developers. Indicative locations for stops are shown in the safeguard in the City of Edinburgh LDP. **No modification proposed.**

#### Ocean Terminal

Delivery timescales of the tram extensions will be set out the Action Programme and Edinburgh LDP Action Programme. **No modification proposed.**

#### Mr Julian Siann

The decision on funding the tram extension to Newhaven will be taken by City of Edinburgh Council in 2017. Developer contributions are being sought towards partially funding tram network improvements. **No modification proposed.**

#### Trinity Community Council

Improvements within North Edinburgh are set out in the Edinburgh LDP and subsequent Action Programme. Only strategic projects critical to plan delivery and cross boundary infrastructure is set out in the SDP. Cross Boundary movement is

being appraised in the Cross Boundary Study and a series of additional mitigation measures will arise from that. The types of interventions are set out in section B of Table 6.1. **No modification proposed.**

### **East Lothian Issues and Transport Infrastructure**

#### Dunbar Community Council

Car Parking at Dunbar station is a matter for East Lothian Council, Network Rail and SEStran. East Lothian Proposed LDP safeguards land for platform lengthening at Dunbar Station. **No modification proposed.**

#### Haddington and District Amenity Society

Transport interventions become committed and funded as development proposals are progressed. Therefore it is not possible to base future strategic scales of development on committed schemes only. The Haddington Rail proposal is not supported in Strategic Transport Projects Review, the SEStran Delivery Strategy or East Lothian LDP. Paragraphs 6.1 to 6.4 of the Proposed Plan set out the required relationships between development and public transport and town centres. **No modification proposed.**

#### Queen Margaret University

The SDP does not prioritise the delivery of necessary transport infrastructure over others in different areas of the region as SESplan is not a funding or decision making body with regards to transport infrastructure spending. Details of plans and delivery of these schemes are set out in the accompanying Action Programme and East Lothian LDP. **No modification proposed.**

#### Prestonpans Community Council

Platform lengthening proposals on the North Berwick line and interventions at A1 junctions are set out in greater detail in the East Lothian Proposed LDP. Section B of table 6.1 sets out that interventions will be delivered on the A720. The exact nature of those will be identified through the Cross Boundary Study and ongoing appraisal work. This will be reflected in an updated Action Programme. AECOM, on behalf of Transport Scotland are undertaking a detailed study on design options for the Sheriffhall Roundabout and East Lothian Council are proposing to gather contributions for improvements at Old Craighall. **No modification proposed.**

#### Wallace Land and Investment and Management

Park and Ride sites are not shown on diagram 6.2 or individual set out in Table 6.1. The East Lothian LDP indicates that car park provision may be expanded at Drem Station. There is no need to identify this explicitly in the SDP. **No modification proposed.**

### **Fife Issues and Transport Infrastructure**

#### Mr Stuart Duffy

The Fife LDP and Action programme includes information on the Rosyth Bypass. However, dualling of the road to the Kincardine Bridge is not proposed and it is not included in the SEStran Regional Transport Strategy (RTS) or RTS Delivery Plan. Locations of stations on any future Dunfermline-Alloa passenger service is a matter for a future technical study and not this SDP. When their location is determined they should be safeguarded in the LDP as set out in paragraph 6.13 **No**

## **modification proposed.**

### Cockburn Association

Design and exact routing of the Dunfermline Relief Road and Distributor road and its impact on the Dunfermline Green Belt is a detailed matter not appropriate for this SDP. All relevant considerations, including landtake, will be taken into account when the schemes are designed. **No modification proposed.**

### Scottish Government

The annotation in Table 6.1 and wording of Paragraph 6.9 is quite clear that neither the Halbeath Rail Halt nor Levenmouth Rail Link are committed improvements. Scottish Transport Appraisal Guidance appraisals have been completed for both proposals. These qualified inclusions in the plan are more detailed than those included in Figure 2 of the currently approved SDP. Therefore their qualified inclusion is in compliance with SPP. Moving both improvements into section C of Table 6.1 would indicate that they will not be developed before 2030. However, subject to future decisions, they could be developed within the first 12 years of the Proposed Plan, including any potential infrastructure funding proposals that may emerge from City Deal or decisions on Network Rail investment periods. There is strong support from Fife Council for both projects. It is not the role of a development plan to only repeat already committed infrastructure investment; rather it should set out what infrastructure may be required. The Halbeath Rail Halt is included in the Action Programme under Action 38: Park and Ride sites. **No modification proposed.**

### Mirabelle Maslin

Capacity of Fife Circle Services is being reviewed as part of the Network Rail Scotland Route Study.

The SDP supports non car transport and the need for modal shift however, the Dunfermline Western Distributor Road and Northern Relief Road projects are required to support the strategic scale of development planned in Dunfermline. They are contained within the adopted Fife LDP. Developer contributions are being sought towards the Dunfermline road projects set out in the SDP. Details are set out in the Fife LDP and accompanying Action Programme. **No modification proposed.**

### North Dunfermline CCs & Halbeath TRA

The Fife LDP Transport Appraisal was reviewed by Transport Scotland and included as part of the Fife LDP examination. Table 6.1 sets out that further appraisal of the Halbeath rail Halt is required. It is not a necessary requirement to allow current planned development to proceed. **No modification proposed.**

## **Midlothian Issues and Transport Infrastructure**

### Mr William McCulloch

It is not considered that improvements to the B7026 are a matter for the SDP. They are not required to support a scale of development critical to plan delivery or cross boundary in nature. The matter is more appropriately dealt with by the Midlothian LDP and SEStran. **No modification proposed.**

### Transform Scotland

Neither suggested project is included in the Fife LDP, SEStran RTS, RTS Delivery Plan, current STPR or Network Rail Scotland Route Study. Therefore there is no basis for including them in the SDP. **No modification proposed.**

### Musselburgh Conservation Society , Midlothian Green Party , Sir Robert Clerk , Penicuik Estate/Penicuik House Preservation Trust

The extension of Edinburgh Tram to Gilmerton, the Bush and Penicuik is only identified as being in the conceptual stage in the SEStran Delivery Plan (REF) and it is not included as a potential proposal in the Edinburgh LDP, Midlothian LDP or SDP1. Whilst there are merits to the proposal as a sustainable mode along the A701 corridor to Penicuik, it does not have support for inclusion in the SDP at this stage. **No modification proposed.**

### **A701 Relief Road and A702 Link**

#### Cockburn Association

Reasoning behind the A701 Relief Road and A702 is more appropriately set out in the Midlothian LDP and accompanying Transport Appraisals. Additional detail is also set out in the SDP and LDP Action Programmes. It is not appropriate for a concise and graphic based SDP. **No modification proposed.**

### Eskbank & Newbattle Community Council , D and L McAuslan , Daya Feldwick , Dr Helen McKay , Mrs Constance Newbould , Mrs Frankish , Mrs Mirabelle Maslin , Ms Ailsa Carlisle , Transform Scotland , David Newbould

The proposal is necessary in order to deliver the development strategy in the A701 corridor and the active travel and public transport improvements brought about by freeing up capacity on the existing stretch of road between the A720 / A701 and A703 / A701 junctions. It is acknowledged that depending on the final routing and specification of the A701 relief road and A702 link, there is likely to be development on green belt and prime quality agricultural land.

The proposal is also required to be identified in the SDP as it is a strategic improvement that would impact on cross boundary movement through its connection to the A720 and City of Edinburgh.

The issue of the A701 Relief Road and A702 Link is being examined in detail under issue 7 as part of the Midlothian LDP examination. This has a target date of 09 Jul 2017. Even accounting for some slippage, the examination report will be available before the examination of the SDP is closed. It is proposed that the matter is more appropriately dealt with at the Midlothian examination. Therefore no modification is proposed unless through the Midlothian LDP examination, the A701 Relief Road and A702 Link is modified in a way that would change its notation in the Proposed Plan. **No modification proposed.**

### Damhead & District Community Council , Roslin and Bilston Community Council , David Newbould

As above. As it is not proposed to delete reference to the A701 Relief Road and A702 Link, then it will not be replaced with improvements, including widening, to the A701, A702 and A703. **No modification proposed.**

Mr John Clark

As above. As it is not proposed to delete reference to the A701 Relief Road and A702 Link, then it will not be marked that further appraisal is required. Appraisals of the proposal were undertaken for the Midlothian LDP. **No modification proposed.**

D and L McAuslan

As above. Midlothian Council is considering commission work to progress survey and design work in the near future. Impact assessments and appraisals were undertaken as part of the Midlothian LDP process. As the project is likely to be delivered before 2030, it is not appropriate to move it into section C of table 6.1. **No modification proposed.**

Daya Feldwick , Mrs Frankish

As above. The proposed scheme was included as part of an appraisal of options for the LDP. Therefore a further A701 study is not required and alternative assessments are not required. **No modification proposed.**

Dr Helen McKay

Bus services in Midlothian are a matter for the local and regional transport strategies, not the SDP. Strategic functional and recreational cycle routes in Midlothian are proposed in the Walking and Cycling section of the plan. Localised routes are more appropriately dealt with in the Midlothian LDP and transport strategy. Park and ride provision is addressed in section B of table 6.1 and accompanying Action Programme. More detail on proposals is set out in the Midlothian LDP and accompanying Programme. **No modification proposed.**

Constance Newbould

Bus services in Midlothian are a matter for the local and regional transport strategies, not the SDP. The Park and Ride at Hillend is included in the SESplan Action Programme and is part of the Orbital Bus proposal. The suggested A74-A720 link running to the west of Pentlands is a matter for the upcoming reviews of the National Transport Strategy and STPR. It is not included in any current strategy or plan. **No modification proposed.**

PSL Land LTD

Midlothian Council formally abandoned the former Local Plan A701 safeguarded road scheme referred to by PSL Land Ltd, earlier this year in favour of the A701 relief road and A702 link in the Midlothian Proposed Plan. **No modification proposed.**

**Scottish Borders Issues and Transport Infrastructure**

Lammermuir Community Council

With regards to Reston Station, the SDP does not prioritise the delivery of necessary transport infrastructure over others in different areas of the region as SESplan is not a funding or decision making body with regards to transport infrastructure spending. In January 2017, further commitment was given by Scottish Government, East Lothian Council and Scottish Borders Council towards new stations at East Linton and Reston. **No modification proposed.**

Peebles Community Trust , Peebles & District Community Council

It is noted that East-West connections in the Scottish Borders could be improved. With regards to improvements to the A72, the Trunk Road Network is a national asset developed and managed by Scottish Government agency Transport Scotland. The network has been reviewed and rationalised over the years and there is no evidence to suggest that Transport Scotland would consider expanding the network in the Scottish Borders in the future. **No modification proposed.**

### **West Lothian Issues and Transport Infrastructure**

Mr George Adam

With regards to M9 Junction 3, the SDP does not prioritise the delivery of necessary transport infrastructure over others in different areas of the region as SESplan is not a funding or decision making body with regards to transport infrastructure spending. **No modification proposed.**

### **Borders Railway**

Campaign for Borders Rail , Lammermuir Community Council , Midlothian Green Party , Moorfoot Community Council , Peebles and District Community Council , Mirabelle Maslin , Transform Scotland

Representations seek commitments to priority improvements in capacity on the Borders Railway, including new double track sections. 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, 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. Any changes in the status of the project will be reflected in updates to the SESplan Action Programme. The SDP does not prioritise the delivery of necessary transport infrastructure over others in different areas of the region as SESplan is not a funding or decision making body with regards to transport infrastructure spending. **No modification proposed.**

Mirabelle Maslin

Car Parking at Borders Rail stations is a matter for Scottish Borders Council, Midlothian Council, Network Rail and SEStran. **No modification proposed.**

Lammermuir Community Council , Peebles and District Community Council

Pre-feasibility study for Borders Railway extension to Carlisle is underway. The SDP does not prioritise the delivery of necessary transport infrastructure over others in different areas of the region as SESplan is not a funding or decision making body with regards to transport infrastructure spending. Paragraph 6.13 requires LDPs to safeguard land required. **No modification proposed.**

Mr Charles Strang , Mr John Grounsell

The suggested extension to Berwick is a matter for the upcoming reviews of the

National Transport Strategy and STPR. It is not included in the Scottish Borders LDP, current STPR, SEStran RTS or Delivery Plan. **No modification proposed.**

### **Regional and Cross Boundary Issues and Infrastructure**

#### Lammermuir Community Council

Regarding the A1, the SDP does not prioritise the delivery of necessary transport infrastructure over others in different areas of the region as SESplan is not a funding or decision making body with regards to transport infrastructure spending. **No modification proposed.**

#### Cockburn Association

Transport Scotland will be monitoring effectiveness of the Queensferry Crossing. It is not appropriate to set this out in an SDP. **No modification proposed.**

#### Mr Jon Grounsell

The alignment of the HSR route to England is being considered by Scottish Government, the Department for Transport and Network Rail. **No modification proposed.**

#### Mactaggart & Mickel Homes , Shepherd Offshore

Wording of paragraph 6.13 regarding safeguarding is considered sufficient. More detail on infrastructure investment is set out in the Action Programme. **No modification proposed.**

#### Shawfair LLP , Shepherd Offshore (Scotland) Ltd

Additional direction to LDPs is not considered necessary. **No modification proposed.**

#### Edinburgh Bioquarter and Partners

SESplan recognises the importance of delivering improvements to the A720. They are included in section B as developer contributions and other funding sources will be required towards identified interventions from the Cross Boundary Transport Appraisal. Updated information on A720 interventions will be set out in updated Action Programmes. AECOM, on behalf of Transport Scotland are undertaking a detailed study on design options for the Sheriffhall Roundabout and East Lothian Council are proposing to gather contributions for improvements at Old Craighall. **No modification proposed.**

#### Gullane Area Community Council

SESplan recognises the importance of delivering improvements across the regional transport network, including the A720. The SDP does not prioritise the delivery of necessary transport infrastructure over others in different areas of the region as SESplan is not a funding or decision making body with regards to transport infrastructure spending. **No modification proposed.**

#### Hallam Land Management , Park Lane (Scotland)

Any detailed proposals for the A8 and A90 corridors are set out in the City of Edinburgh LDP and Action Programme. **No modification proposed.**

Mr Charles Strang

Specific references to projects are not appropriate at that introductory paragraph. Figure 6.1 shows recreational routes connecting to England. **No modification proposed.**

Scottish Government , Network Rail

Edinburgh Cross Rail Services relate to service improvements to allow more cross Edinburgh services that would allow those in East Lothian, Midlothian and Scottish Borders to access employment areas in West Edinburgh (Gyle, Edinburgh Park) and along the M8 Corridor (Livingston). This would be achieved by not terminating North Berwick services at Edinburgh and joining up Fife Circle and Borders services (some Fife to Borders services already operate). Doing so could encourage modal shift of journeys off the A720 westbound in the AM peak reducing forecast impacts on the bypass in the Cross Boundary Study and SDP2 Transport Appraisal. Cross Edinburgh services improvements were suggested by both SEStran and SESplan as mitigation options to the Cross Boundary Project. SESplan will clarify in the Action Programme that this proposal does not involve upgrades to the South Suburban Service. As this is a service improvement it is a matter for appraisal by Transport Scotland, Network Rail and Scotrail. **No modification proposed.**

Network Rail

East Coast Mainline Improvements relate to proposed platform lengthening in East Lothian as well as potential improvement to approaches to Edinburgh Waverley set out in the Network Rail Scotland Route Study.

The Action Programme entry clarifies that the Edinburgh-Glasgow Rail Improvements is the Edinburgh Glasgow Improvements Programme (EGIP). It is not required to use such specific terminology in the Table 6.1 as the acronym EGIP is not widely understood outside a professional environment.

Wording regarding East Coast Mainline four line section of track is not incorrect as that is what would be required to deliver an additional settlement at Blindwells. However, it is now understood that the formation of four line section of track between Prestonpans and Drem is now being considered but is not committed. If the Reporter feels a change is required, then the line in Section C of Table 6.1 could be replaced as suggested. **No modification proposed.**

**National Transport Infrastructure**

Dr Robin Barclay

Services, including ferry connections to continental Europe, are a matter for the Regional Transport Partnership. There is currently a freight only service between Rosyth and Zeebrugge. **No modification proposed.**

Cramond and Barnton Community Council

Noise assessments are covered by separate planning requirements and it is not appropriate to repeat these here. Routing of flight paths is a matter for separate legislation and not a matter for the SDP. **No modification proposed.**

Forth Ports Ltd

The National Transport developments section in the plan relates to statements on national developments within the SESplan area in NPF3. Therefore it is not appropriate to rename the section. The existing wording of paragraph 6.14 is adequate and is in compliance with the statements in NPF3 whereas the proposed modification goes beyond the scope of NPF3. Exact makeup of land uses requiring planning permission at ports must be considered in reference to neighbouring and planned uses and is therefore an LDP matter. **No modification proposed.**

Mr Charles Strang

NPF3 states that “enhancement of the gateway role of Edinburgh Airport will bring economic and connectivity benefits”. It also identified that enhancements to the airport are National Developments. Therefore SESplan cannot halt airport expansion. SESplan does not control the level of internal flights to / from Edinburgh Airport.

Environmental impacts of airport expansion will be set out in the Airport Masterplan and documents accompanying planning proposals. An environmental section of the plan is not required as it is a cross cutting theme throughout, with particular references in spatial strategy, supporting non-car travel and placemaking principles.

**No modification proposed.**

**Other Matters**

Cockburn Association

Design and exact routing of transport schemes, including planting, is a detailed matter not appropriate for this SDP. All relevant considerations, including landtake and landscaping, will be taken into account when the schemes are designed. Decisions on maintenance and repair of roads are matters for individual Councils and trunk road contractors and not a matter for an SDP. **No modification proposed.**

Crawford and Douglas Ritchie , Homes for Scotland

Table 6.1 sets out transport projects that are to be delivered across the plan period as well as longer term projects. Non cross boundary interventions are set out in LDPs. The statutory review period for SDPs requires submission of a proposed plan within four years of the current plan’s approval date. This presents several opportunities in the run up to 2030 to set out interventions required to support growth beyond 2030. They will be set out in subsequent SDPs once appropriate assessments have been undertaken. **No modification proposed.**

Forth Ports Ltd

Exact routing of proposals is not an appropriate matter for the SDP. **No modification proposed.**

Liberton and District Community Council

Noted. The plan sets out a range of multi modal transport projects and the strategy seeks to promote non-car travel. **No modification proposed.**

Moorfoot Community Council , South West Communities Form

As set out in the Spatial Strategy section of the plan and the Schedule 4 for Issue 1, the Proposed Plan and LDPs are locating development in around existing settlements where shops, public transport services and jobs are located. The housing strategy of the Proposed Plan is to deliver a higher proportion of housing within Edinburgh, where approximately half of future jobs in the region are expected to be located. Therefore housing will be located nearer to workplaces and the strategy is not reliant on long distance commuting. **No modification proposed.**

Musselburgh Conservation Society

It is noted that essential infrastructure required to support development should be delivered. More details are included in LDPs and their action programmes. However, neither the Edinburgh cross-rail or Sheriffhall upgrade are yet formally funded and therefore cannot be confirmed as committed and moved to column A. However, a further design study is underway for the latter. **No modification proposed.**

Rosewell and District Community Council

Specific bus routes and frequencies are not an SDP matter. **No modification proposed.**

Scottish Natural Heritage

Strategic Walking and Cycling Routes are included in Table 6.1. There is no need to specifically reference Orbital Route.

No walking and cycling plans are included in the A801 proposals at this stage. This is a matter for West Lothian Council. **No modification proposed.**

Transform Scotland

A701 and Dunfermline road proposals are required to deliver development. A1 dualling is required to improve connectivity, journey times and road safety along this key East Coast Corridor. **No modification proposed.**

Mr George Adam

Whilst important, local road infrastructure is an LDP matter. **No modification proposed.**

Mrs Mirabelle Maslin

Specific interventions and their timescales are set out in the Action Programme. **No modification proposed.**

Scottish Government

SESplan does not agree that further changes are required to paragraph 6.11. All the schemes apart from High Speed Rail are marked as 'not committed' therefore there can be no impression that the schemes have already been approved subject to further study. They may not be delivered in the plan period but they are supported by SEStran and SESplan member authorities. The addition of 'aspirational' diminishes this strong level of support and implies that these projects will never be delivered. The use of further appraisals implies that this will cover rational, viability and deliverability. It is not required to state explicitly every aspect

that will be assessed in these appraisals. **No modification proposed.**

It is clear from reading the Proposed Plan that the diagrams are meant to be read alongside the text. With Figure 6.2 this also means reading the corresponding Table 6.1, which sets out the individual projects shown on the diagram and provides more information on their current status and level of commitment. Setting out this status in Figure 6.2 would result in it having an overly complicated legend and the diagram becoming cluttered, difficult to interpret and dated. Amendment to Figure 6.2 is not considered necessary as a result. Details of appraisals, funding, current status and delivery mechanisms are more appropriate content for the Action Programme, not the concise and visionary SDP. However, if the Reporter feels that further clarification is required, a footnote could be added to Figure 6.2 requiring it to be read in alongside Table 6.1 and additional text could be added to paragraph 6.9 directing readers to the accompanying Action Programme, LDPs and LDP Action Programmes where more detail on these matters is available. **No modification proposed.**

SESplan fundamentally disagrees with Scottish Government's response to the Transport Appraisal (REF) as the outline methodology for the appraisal was discussed in advance with Transport Scotland's Technical Analysis Branch before the Appraisal was undertaken. The proportionate approach that the Appraisal would build on the emerging outputs of the Cross Boundary Study (CBS) was discussed at a meeting between SESplan, SEStran and Transport Scotland on 24 November 2015 and then again at a specific methodology meeting on 2 March 2016. After this SESplan confirmed the methodology with the consultants SYSTRA as set out in the Transport Appraisal covering paper and chapters 1 and 2 of the SYSTRA produced Transport Appraisal Report. In summary, the Transport Appraisal assesses the additional development only required in Edinburgh, above that which is being assessed in the CBS to meet the Housing Supply Target for the Proposed Plan. Only additional development in Edinburgh is assessed, as set out in paragraph 5.8 of the Proposed Plan, the other SESplan member authorities have current estimates of land supply higher than the Proposed Plan Housing Land Requirements. This approach is proportional to the limited scale of additional development required by the Proposed Plan and builds on the previous SDP and LDP appraisals, as well as the Accessibility Analysis undertaken at the Main Issues Reports stage (contained within Spatial Strategy Technical Notes (REF)).

Chapter 3 of the Transport Appraisal report identifies the impacts of the additional development in Edinburgh and compares it to the impacts identified in early outputs from the CBS. The table on page 22 identifies that at the SESplan regional scale the additional impacts are minimal with 1% increases in distance travelled and network travel time compared to comparative 27% and 41% increases from the 2012 base to CBS. Within City of Edinburgh the impacts are higher, particularly around North Edinburgh due to the level of development in the adopted LDP that is phased to be delivered from 2024 onwards, as well as a high level of evidence urban windfall. Impacts are identified along the A8 corridor, likely due to additional housing at the International Business Gateway that was modelled. However, mitigation measures were not identified at that time. Updated West Edinburgh transport improvements are now further identified in the updated Action Programme.

Testing packages of mitigation options is one of the outputs of the CBS. The CBS contract was awarded in spring 2014 and was originally programmed to be finished in summer 2015. Due to delays in data gathering, issues with updating the model, considerable time spent checking model outputs and other unknown reasons, project timescales have continued to slip so that as of end February 2017, SESplan and other key stakeholders have still not received a draft report from Transport Scotland. It was agreed at the methodology meeting in March 2016 that the Proposed Plan Transport Appraisal would not be able to test mitigation measures until the mitigation measures and their impacts were available in the completed CBS Report. That is why Chapter 5 of the Transport Appraisal Report sets out potential interventions in outline detail only. This would not have been required if the CBS had been completed by the end of 2015. However it has slipped considerably and been delayed in a manner which cannot be allowed for within the Proposed Plan preparation timetable, as it has to be prepared within statutory timescales and submitted for examination by end June 2017. SESplan had previously raised concerns with Transport Scotland regarding the slippage in timescales for the CBS and how it would not align with Proposed Plan statutory timescales and its Transport Appraisal.

The response refers to impacts at Hermiston Gate. However, SESplan cannot test additional intervention there until a decision has been made about the Hermiston Gate interventions options identified in the CBS. The response incorrectly states that SESplan identifies allocations. This is incorrect. The SDP does not allocate sites but identifies the level of housing to be delivered over the 12 year plan period. In compliance with SPP paragraph 118 and set out in Proposed Plan paragraph 5.10, the exact level of additional land to be allocated and location of these sites cannot be determined until LDP preparation. Therefore identifying detailed interventions and delivery strategies to mitigate impacts cannot be undertaken until the exact level of additional development and location of sites is identified. This will not occur until the Edinburgh LDP is being prepared, post approval of the Proposed Plan in 2018.

Regarding delivery and funding mechanisms, SESplan is not deferring all decisions to the CBS. Paragraphs 6.16 to 6.19 set out the approach to preparing a Cross Boundary Contributions Framework once the outputs from the CBS are available. Adopted and Proposed LDPs also contain approaches towards delivering and funding necessary transport infrastructure in line with SDP1 policies 8 and 9. However, due to delays in the CBS it is impossible for SESplan to go into much further detail in funding and delivery mechanisms as the evidence from the CBS is not available to be assessed and used to inform decisions. Given the scale of the impacts identified in the CBS and the likely costs of some of the interventions on nationally important trunk roads or rail alternatives, funding from Scottish Government / Transport Scotland will be required. This is expected to be identified in the upcoming review of the National Transport Strategy and Strategic Transport Projects Review.

The response refers to the adequacy of the SDP1 Transport Appraisal. However, it should be noted that the level of detail sought would not have provided the accurate information on impacts or interventions due to the subsequent Scottish

Ministerial modifications to SDP1 that significantly increased the housing land requirement. The level of detail, using site specific locations of development, was only possible in the CBS because it was undertaken whilst LDPs were being prepared.

SESplan and its member authorities wish to continue to work constructively with Transport Scotland and Scottish Government to identify interventions and delivery and funding mechanisms, given the importance of the SESplan region as a driver of the national economy, as set out in NPF3. However, this can only be progressed once the significantly delayed draft final CBS report has been sent to stakeholders for comments and consideration. **No modification proposed.**

Support for specific projects set out in table 6.1 was received from seven different organisations not listed in this issue.

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]

<b>Issue 15</b>	<b>Funding Transport Infrastructure</b>																			
<b>Development Plan reference:</b>	<b>Page 63, Paragraphs 6.16 to 6.19</b>	<b>Reporter: [Note: For DPEA use only.]</b>																		
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>																				
<table border="0"> <tr> <td>Edinburgh Bioquarter Partners (037370)</td> <td>New Ingliston (929755)</td> </tr> <tr> <td>Forth Ports Ltd (929573)</td> <td>ORS (037419)</td> </tr> <tr> <td>Gullane Area Community Council (037068)</td> <td>Park Lane (Scotland) Ltd (039990)</td> </tr> <tr> <td>Hallam Land Management Ltd (039805)</td> <td>Roslin and Bilston Community Council (790524)</td> </tr> <tr> <td>Hargreaves UK Services Ltd (038489)</td> <td>Scottish Natural Heritage (790587)</td> </tr> <tr> <td>Mactaggart &amp; Mickel Homes (038949)</td> <td>Shawfair LLP (039940)</td> </tr> <tr> <td>Mrs Mirabelle Maslin (928549)</td> <td>Shepherd Offshore (Scotland) Ltd (038954)</td> </tr> <tr> <td>Muir Smith Evans (202101)</td> <td>Taylor Wimpey/Hallam Land (039521)</td> </tr> <tr> <td>Network Rail (928260)</td> <td></td> </tr> </table>			Edinburgh Bioquarter Partners (037370)	New Ingliston (929755)	Forth Ports Ltd (929573)	ORS (037419)	Gullane Area Community Council (037068)	Park Lane (Scotland) Ltd (039990)	Hallam Land Management Ltd (039805)	Roslin and Bilston Community Council (790524)	Hargreaves UK Services Ltd (038489)	Scottish Natural Heritage (790587)	Mactaggart & Mickel Homes (038949)	Shawfair LLP (039940)	Mrs Mirabelle Maslin (928549)	Shepherd Offshore (Scotland) Ltd (038954)	Muir Smith Evans (202101)	Taylor Wimpey/Hallam Land (039521)	Network Rail (928260)	
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<b>Provision of the Development Plan to which the issue relates:</b>	<b>Cross Boundary Developer Contributions Framework</b>																			
<b>Planning Authority's summary of the representation(s):</b>																				
<p><u>Edinburgh Bioquarter Partners</u> The exclusion in paragraph 6.18, second bullet, to which development contributions will be applied to, should be extended to those allocations in development plans which have specific criteria for the delivery of essential infrastructure already agreed as part of the allocation, within the relevant Local Development Plan (LDP) or associated Supplementary Guidance.</p> <p><u>Forth Ports Ltd</u> Legal agreements regarding Edinburgh Waterfront have already been agreed even though consents have lapsed. It would be unfair to seek further payment for additional transportation requirements which have emerged since initial legal agreements were signed and in some cases, developer contributions paid, when permissions are being renewed.</p> <p><u>Gullane Area Community Council</u> A720 improvements are urgently needed and are of national importance therefore they should be funded nationally and not rely on developer contributions.</p> <p><u>Hallam Land Management Ltd., Park Lane (Scotland) Ltd.</u> Cross Boundary Contributions Framework needs to comply with the Circular on Planning Obligations, without duplicating other contributions mechanisms.</p>																				

Hargreaves UK services Ltd

Support supplementary guidance but should be consulted on during preparation and should be flexible to deal with the individual constraints and characteristics of sites and changing infrastructure requirements.

Mactaggart & Mickel Homes , Shawfair LLP, Shepherd Offshore (Scotland) Ltd

Transportation constraints should be addressed without delay. Therefore Supplementary Guidance on a Cross-Boundary Transport Contributions Framework should be available alongside the plan given the importance of such matters within the Plan itself. This work should already be finalised given the significant impacts infrastructure provision has on development. The use of zones could create conflict between Strategic Development Plan (SDP) and LDP requirements. Additional contributions may render schemes unviable. Standard charges would conflict with viability being considered.

Mrs Mirabelle Maslin

6.19 is crucially important. How can this be ensured?

Muir Smith Evans

Danger that over-zealous requirements for developer contributions will lead to otherwise viable development being made unviable and development opportunities will be constrained. The effect will be quite the opposite of the policy intention.

Policy aspirations should therefore seek to recognise that viability needs to be assessed and that contributions should reflect this. The core aim of the strategy should be to comply with a presumption in favour of sustainable economic development and to enable policy compliant development proposals to be delivered.

In particular contributions should only be sought where they are necessary in planning terms and serve a proper planning purpose and should not seek to resolve existing deficiencies in infrastructure provision. Policy should make explicit reference to tests of scale and kind and contributions should be limited to those that make an otherwise unacceptable proposal acceptable.

Any system of developer contributions that requires contributions to fund measures which are needed to implement the strategy but may not be directly related to an individual development's impact (individually or cumulatively) would not be consistent with current Scottish Government guidance and would be an unrealistic burden on new development and would likely lead to further legal challenge, delay and uncertainty.

Network Rail

Network Rail are keen to seek continued support for safeguarding and improving the safety and capacity of the existing and future railway network in tandem with new development. Improvements should be considered in the planning of development with appropriate strategic assessment including mitigation and capacity issues undertaken.

#### New Inqliston

Final bullet of paragraph 6.18 needs to be reinforced so that Contributions Framework complies with Circular 3/2012.

#### ORS

The second bullet point at paragraph 6.18, p63, should be edited to allow consideration of the Contributions Framework not applying to sites where a Masterplan may already be approved. Redheugh site has been subject to a degree of transport consideration. However, the Supplementary Guidance raises the possibility of additional measures which are unknown and which therefore bring additional unnecessary risk to delivery. Propose that where a site has an approved Masterplan that additional cross boundary transport obligations should not apply.

#### Roslin and Bilston Community Council

More clarity required on developer contributions.

#### Scottish Natural Heritage

Early clarity on how all aspects of infrastructure are to be funded and delivered is important if the vision of more people cycling and walking to work (and for other journeys) is to be achieved. Active travel infrastructure should be funded through Cross Boundary Contributions Framework.

#### Shepherd Offshore (Scotland) Ltd

Risk that assessment of development viability will be onerous and elongate timescales for implementation of zones providing little certainty for developers. Additional cost over and above other existing transport contributions may render some schemes unviable which could have serious knock-on effects on LDP allocations and their ability to provide for an effective 5-year housing land supply. Proposal to apply a set of standard charges to each contribution zone is at odds with the notion that viability will be a contribution consideration.

#### Taylor Wimpey/Hallam Land

Representation cautions against overly restrictive financial burdens on private sector developers which can delay development. Considers that funding from the City Region Deal will be key in helping to deliver key infrastructure projects

### **Modifications sought by those submitting representations:**

#### Edinburgh Bioquarter Partners

Paragraph 6.18 second bullet - Modify to read 'In principle, it will apply to housing, business, industrial, retail and commercial leisure developments within contribution zones that do not have planning consent or are not allocated in an up to date development plan including a funding mechanism for the provision of essential infrastructure at the time of the adoption of the Supplementary Guidance'.

#### Forth Ports Ltd

Paragraph 6.18, 2nd bullet point - Modify to read "In principle, it will apply to housing, business, industrial, retail and commercial leisure developments within contribution zones that do not have planning consent at the time of the adoption of the Supplementary Guidance. The impacts of requested contributions on the

viability of these types of developments will be examined during the preparation of the Supplementary Guidance. Contributions will not be sought for planning consents where they seek to replace planning consents which have lapsed but for which legal agreements (including provision for transport infrastructure), have been concluded and payments have been made for transport related works."

Gullane Area Community Council

Table 6.1 and paragraphs 6.10 and 6.17 - modify to state major infrastructure upgrades such as A720 improvements are of national importance therefore should be funded nationally and not rely on developer contributions.

Hallam Land Management Ltd., Park Lane (Scotland) Ltd.

Paragraph 6.18 - Insert new bullet point - "will comply to the Circular on Planning Obligations, without duplicating other contributions mechanisms".

Hargreaves UK services Ltd

Paragraph 6.16 - Include statement that Supplementary Guidance will be made available for consultation during preparation.

Paragraph 6.17 - Insert additional bullet "to be flexible to deal with the individual constraints and characteristics of sites and changing infrastructure requirements"

Mactaggart & Mickel Homes, Shawfair LLP, Shepherd Offshore (Scotland) Ltd

The Supplementary Guidance should be available for full consultation alongside the Plan.

Muir Smith Evans

The role of Scottish Government and local authorities needs to be clearly explained and embedded into the plan. Scottish Government and local authorities need to accept responsibility for dealing with existing deficiencies in infrastructure and not unduly burden new development and investment.

Clear reference to an appropriate baseline is required so that there is a level playing field. This can only be to an established methodology to identify a suitable existing baseline in order to assess the impacts (individually and cumulatively) of a proposed development. Only mitigation to address those specific impacts is appropriate.

Paragraph 6.16 requires more detailed explanation and clear reference to the role of Scottish Government and local authorities and what is meant by the relevant transport appraisals.

Paragraph 6.16 should include explanation of the legal position of how developer contributions must legitimately relate to the impact of a proposal including cross border impacts.

Also, paragraph 6.16 should explain that contributions sought should not render development and therefore economic growth unviable and the methodology for establishing this.

Paragraph 6.17 should delete reference to contribution zones. Any development

that has wider or cross boundary impacts regardless of location within a notional zone should be required to contribute.

The link between development and the proposed infrastructure improvement needs to be explicit and directly relevant.

The method for calculating the contributions requires to include quantification of viability and a standard methodology or template for doing so which will be difficult to capture based on different funding sources and models and different timescales for delivery.

There should also be more focus on a hierarchy of transport infrastructure and modal shift targets encouraging walking, cycling, public transport and green travel plans in terms of developer contributions.

Paragraph 6.18 - clarify that other major developments that are subject to applications with a resolution to grant (subject to S75 Obligations) should be included as committed developments. This could be clarified in the second bullet point.

Further clarity is required on charges being in proportion to the scale and impact of development as this suggests that the impact of development is the key measure. If this is the case, and contributions are related in scale and kind, then there can be little justification for cross boundary mitigation where impacts of a specific development are more local despite wider policy objectives even for proposals within a contribution zone.

The final bullet point should explain how these tests will be applied and there should be a clear link between the development and any mitigation offered as part of the developer's contribution.

#### Network Rail

No modification specified, representation indicates...

That a clear strategic context for seeking developer contributions for required infrastructure enhancements or station improvements as a direct consequence of new development growth is required. This should not be left to Supplementary Planning Guidance, but the key themes should be contained within the text.

#### ORS

Paragraph 6.18, 2nd bullet - Modify as follows "In principle, it will apply to housing, business, industrial, retail and commercial leisure developments within contribution zones that do not have planning consent or do not have an agreed masterplan, where transportation mitigation is considered, at the time of adoption of the Supplementary Guidance."

#### Scottish Natural Heritage

Paragraphs 6.16 - 6.19 - Include statement that active travel infrastructure will be part of the infrastructure funded by the Cross Boundary Contributions Framework. Framework must consider delivery mechanisms.

Shepherd Offshore (Scotland) Ltd

Provide further detail on Cross-Boundary Transport Contributions Framework.

**Summary of responses (including reasons) by Planning Authority:**

Edinburgh Bioquarter Partners, ORS

Individual masterplans or older Local Plan allocations have not assessed wider cumulative transport cross boundary impacts or identified interventions to mitigate them at a cross boundary scale. These are still essential. Therefore it is appropriate that the contributions mechanism is applied to all un-committed development if and when they gain planning consent. Bullets 2 and 7 of paragraph 6.18 states that viability will be considered when setting the level of charge. The Scottish planning system works on a discretionary basis but the first principle of the framework is that the contributions will be levied on all applicable non-committed development. That is development that does not have a planning consent at the time of the adoption of the Supplementary Guidance. **No modification proposed**

Forth Ports Ltd

The level of detail suggested in the modification is not appropriate for the SDP 'policy hook' on which the subsequent Supplementary Guidance is based. The contributions will be levied on all applicable non-committed development – that does not have a planning consent at the time of the adoption of the Supplementary Guidance. **No modification proposed**

Gullane Area Community Council

Discussions are ongoing with Transport Scotland but it is expected that major interventions on the A720 have to be funded by other sources of funding. The Action Programme is the appropriate place for this level of detail. Some smaller scale interventions relating to the A720 are likely to be funded through developer contributions. **No modification proposed**

Hallam Land Management Ltd., New Ingliston, Park Lane (Scotland) Ltd.

The final bullet of paragraph 6.18 states that the Contributions Framework will comply with the tests that apply to planning obligations contained within the circular. The third bullet of 6.18 states that the framework will not duplicate approaches. **No modification proposed**

Mactaggart & Mickel Homes, Shawfair LLP, Shepherd Offshore (Scotland) Ltd

Paragraph 140 of Circular 6/2013: Development Planning (REF) states that "Supplementary Guidance may be prepared and adopted alongside the SDP or LDP, or subsequently." As the Cross Boundary Study was not available at the time of Proposed Plan preparation, the framework could not be produced until a later time. 2<sup>nd</sup> last bullet of paragraph 6.18 sets out that development viability will be considered in setting the levels of charge. **No modification proposed**

Hargreaves UK Services Ltd

Paragraph 141 of Circular 6/2013: Development Planning makes clear that there must be a consultation process during supplementary guidance preparation. It is not appropriate to repeat the contents of that circular here. Details of consultations will be set out in Development Plan Schemes. **No modification proposed**

It is not appropriate to set levels of flexibility at this stage until full assessment of link between development and transport requirements is complete. This is not a level of detail required in an SDP as set out in paragraph 138 of Circular 6/2013.

**No modification proposed**

Muir Smith Evans, Taylor Wimpey/Hallam Land

Development contributions are not expected to wholly fund infrastructure. Local Authorities and Scottish Government are investing in improving local and strategic transport infrastructure in the region. Details are available in Action Programmes. Viability of development will be taken into account when calculating the level of contributions.

There will be a consistent baseline in the technical evidence informing the framework. These are the Cross Boundary Transport Appraisal referred to in paragraph 6.10 and Proposed Plan Transport Appraisal (REF). This will inform the draft Supplementary Guidance when available for public consultation.

The tests in the Planning Obligations Circular 3/2013 (REF) are specific regarding the linkages between direct and cumulative impacts of development and the intervention that contributions are sought towards. The final bullet of paragraph 6.18 states that framework will comply with all tests. Therefore no further statements regarding this matter are necessary in this section of the Proposed Plan.

Contributions zones will be set so that all development within them will be directly or cumulatively linked to the intervention requiring contributions. They are an accepted approach in setting contributions frameworks.

The plan promotes modal shift and section B of table 6.1 sets out that contributions will be sought towards strategic walking and cycling networks. **No modification proposed**

Network Rail

Non car alternatives are included as potential cross boundary options and this covers rail proposals in section B of Table 6.1. Greater detail will be available when the Cross Boundary Study is complete. Rail proposals set out in section A and section C of table 6.1 will not be funded through the cross boundary framework. **No modification proposed**

Scottish Natural Heritage

Strategic Walking and Cycling Routes are included in section B of Table 6.1 and therefore part of the potential list of projects that will be funded by the contributions framework. Details of delivery of individual projects is more appropriately addressed in the Action Programme. **No modification proposed**

Shepherd Offshore (Scotland) Ltd, Mrs Mirabelle Maslin, Roslin and Bilston Community Council

An appropriate level of detail on the Contributions Framework is set out in paragraphs 6.10 and 6.16 to 6.19. This level of detail is compatible with that

required in an SDP as set out in paragraph 138 of Circular 6/2013.

More detail on the operation of the mechanism will be set out in the supplementary guidance. SESplan member authorities already have mechanisms in place for gather contributions towards required transport infrastructure. **No modification proposed**

Three unqualified statements of support for paragraphs 6.16 to 6.19 were received from three respondents.

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]

<b>Issue 16</b>	<b>Other Infrastructure</b>	
<b>Development Plan reference:</b>	<b>The Vision Key Areas of Change South East Key Areas of Change Edinburgh and West A Place for Communities</b>	<b>Reporter: [Note: For DPEA use only.]</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Builyeon Farms LLP (835897) CALA Management Ltd (929806) Cramond & Barnton Community Council (803443) Denholm and District Community Council (040612) Dunbar Community Council (790195) H&H Group Plc (927998) Homes for Scotland (040551) Mrs Jane Kellock (039869) Mactaggart & Mickel Homes (038949) NHS Lothian Public Health and Health Policy (840024)	Mrs Mirabelle Maslin (928549) North Dunfermline CCs & Halbeath TRA (930297) Mrs Gail Reid (035887) Rosewell & District Community Council (790523) Mr Julian Siann (024823) The Trustees of Sir C.M. Dalrymple (835899) Wallace Land Investment & Management (930071) Winchburgh Developments Ltd (832800)	
<b>Provision of the Development Plan to which the issue relates:</b>	Delivery of non transport infrastructure associated with development.	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Builyeon Farms LLP</u>          Education is a strategic matter and should be dealt with by the Strategic Development Plan (SDP). Stating that actions relating to education may be considered strategic but are dealt with in Local Development Plan (LDP) Action Programmes is wrong. Failure to deliver education provision will result in a failure to deliver the scale of house building required.</p> <p>The proposed plan should be accompanied by a cost plan to clearly outline infrastructure costs and funding streams for delivery. Must be empirically tested to demonstrate need and costed so that certainty of delivery and cost implications are known to landowners, developers and communities. The Action Programme must contain greater financial detail on deliverability of infrastructure projects.</p> <p>Proposed plan gives insufficient information on infrastructure projects, their deliverability and funding. Insufficient evidence on impact and importance of City Deal proposals to help deliver infrastructure of emerging LDPs. Lack of joined up approach to strategic funding arrangements necessary to deliver the development strategy in the Plan. No clear and coherent delivery strategy in the Plan to enable</p>		

infrastructure to remove development constraints particularly for education provision. Should make it clear that it is the responsibility of individual Local Authorities to prioritise infrastructure investment decisions to deliver them in an efficient and timeous manner.

The representation indicates this is of particular importance for education within the City of Edinburgh Council area, particularly South Queensferry.

#### CALA Management Ltd

Education is a strategic matter and should be dealt with now by the SDP and Local Authorities and is a council wide issue. Failure to deliver education provision will result in a failure to deliver the scale of house building required. Not appropriate, reasonable or legal to continue to assume the new development alone should pay for education provision. Raises serious concern regarding inaccuracies in Action Programme.

The approach to Funding Transport Infrastructure is reactive rather than proactive and takes no account of the need to deliver committed and future development sites. The delivery of strategic infrastructure, including education, needs addressed as a critical immediate issue to allow existing house building rates to continue in individual Local Authority areas.

Insufficient detail in the proposed plan and action programme of how funding will be put in place to support and enable infrastructure provision. Insufficient funding strategies for the provision of infrastructure may lead to delays to the development process.

#### Cramond & Barnton Community Council

When assessing sites housing development, consideration should be given to the provision of local medical services (e.g. GP services) as experience in local communities of North and West Edinburgh are that current services are operating over-capacity and cannot service proposed housing developments. Currently they are given insufficient consideration.

#### Denholm and District Community Council

Need for housing but must consider location as small communities do not have infrastructure and services to support it.

#### Dunbar Community Council

Concerns Dunbar's infrastructure and local services will be unable to cope with 1200 additional homes. Concerns that congestion will increase with only limited routes crossing the railway line which bisects the town. Concerns that extensions to schools, whilst paid for by development, do not pay for additional teachers and result in loss of playing fields. Would like more information on this. Enhancements will be required to strategic waste water assets to bring forward development. Health services stretched and at capacity. Developers do not contribute to this. Needs to be provision within Dunbar for end of life care, sheltered housing and nursing homes when there is a growing ageing population.

#### H&H Group Plc

In addition to housing, infrastructure delivery is a key priority which needs to be addressed. Encouraged that in relation to West Lothian issues surrounding infrastructure and in particular education provision is highlighted but consider there should be guidance on how infrastructure is to be addressed at strategic and local level.

#### Homes for Scotland

Inadequate reference in the proposed plan to analysis/demand on secondary schools required to meet future housing land allocations.

#### Mrs Jane Kellock

Requirement for over 8,000 homes in West Lothian needs to be built in tandem with health care provision.

#### Mactaggart & Mickel Homes

Consider that more emphasis should be placed on infrastructure challenge and that the Plan should go further in offering support to allocated sites where there are infrastructure constraints and must give clear direction to all stakeholders. Emerging Plan should place greater emphasis on a new delivery mechanism as set out in the Review of the Planning System materialising.

#### NHS Lothian Public Health and Health Policy

Imperative that investment in health and social care infrastructure is included in partnership discussions. Any housing developments should not be approved until Integration Joint Boards and Health and Social Care Partnerships have been part of the decision making process.

#### North Dunfermline CCs & Halbeath TRA

Commitment must be made to put the required infrastructure in place before housing is built. Expansion, such as in Dunfermline, has been let down by lack of infrastructure being in place including education, health, recreation and youth facilities and social services.

Traffic congestion has significantly increased and air quality has decreased. Public transport has also become overcrowded. Proposed Plan must focus on delivery of infrastructure to ensure the housing the plan demands be built is supported. Whilst support is given to necessary housing where it can be justified, concerned that SESplan partners and Scottish Government are leaving market forces to address infrastructure. Recent state funded infrastructure has failed to deliver optimum performance due to cost restrictions. Strategic infrastructure must be delivered in a timely manner to support any further expansion in Dunfermline.

#### Mrs Mirabelle Maslin

Considers that the Proposed Plan must include a commitment that government will ensure that money is made available to pay for the necessary infrastructure. Significant difficulties in maintaining upgrading and creating infrastructure. Transport infrastructure oversubscribed. Provision of medical services for large increases in population not mentioned in the plan and services are overloaded. Education provision hardly mentioned.

Mrs Gail Reid

Communities are constantly changing with insufficient infrastructure and services, and out of control traffic growth.

Rosewell & District Community Council

Accommodating this scale of growth will lead to even more difficulty to service this increase in population with overstretched services. Development should integrate with shops and services.

Mr Julian Siann

Nothing in Proposed Plan on social services provision. Pressures on medical practices, schools and community facilities. Housing must go hand in hand with more community provision and this should be stated as an objective in the Plan.

The Trustees of Sir C.M. Dalrymple

Education is a strategic matter and should be dealt with by the SDP. Stating that actions relating to education may be considered strategic but are dealt with in LDP Action Programmes is wrong. Failure to deliver education provision will result in a failure to deliver the scale of house building required. The proposed plan should be accompanied by a cost plan to clearly outline infrastructure costs and funding streams for delivery. Must be empirically tested to demonstrate need and costed so that certainty of delivery and cost implications are known to landowners, developers and communities.

The Action Programme must contain greater financial detail on deliverability of infrastructure projects. Action Programme omits reference to the importance of the delivery of new schools provision within City of Edinburgh to deliver the LDP. Must be empirically tested to demonstrate need and costed so that certainty of delivery and cost implications are known to landowners, developers and communities.

Land constraints should be taken account of in relation to density of development and land use planning e.g. pylons and past mine workings. The interface with transport links and road structures should take account of local authority areas and strategic planning at an early stage. Lack of joined up approach to strategic funding arrangements necessary to deliver the development strategy in the Plan. No clear and coherent delivery strategy in the Plan to enable infrastructure to remove development constraints particularly for education provision.

The representation indicates this is of particular importance for education within the City of Edinburgh Council area, specifically Newcraighall.

Wallace Land Investment & Management

Inadequate reference in the proposed plan to analysis/demand on secondary schools required to meet future housing land allocations.

Winchburgh Developments Ltd

Education is a strategic matter and should be dealt with by the Strategic Development Plan. Stating that actions relating to education may be considered strategic but are dealt with in Local Development Plan Action Programmes is

wrong. Failure to deliver education provision will result in a failure to deliver the scale of house building required.

Object to the omission in the Action Programme of reference to the delivery of new schools provision as a strategically important in delivery of Winchburgh. New non-denominational and denominational schools are required to address secondary school education capacity shortfalls that affect the entire east of West Lothian. It is unreasonable to expect new development to pay for all schools in advance.

#### **Modifications sought by those submitting representations:**

##### Builyeon Farms LLP

Add new section after Section 3 in the proposed plan containing clear, costed funding and delivery strategy, with a separate, additional cost plan for individual projects.

Action Programme to be revised in relation to the provision of infrastructure, in particular, education and the approach to funding.

After 'existing infrastructure' in paragraph 3.1 add 'Strategic Development Plan planning authorities will, individually, actively enable the funding and delivery of new infrastructure, including new schools provision, in growth areas to meet Scottish Planning Policy requirements and Scottish Government housing targets'.

##### CALA Management Ltd

Plan should set out level of strategic infrastructure required, including Education, and the mechanisms in place to deliver them. Add new section 3 or to Action Programme or separate supporting document that sets out a clear and costed funding and delivery strategy and a standalone costing plan detailing individual strategic projects to be agreed in advance with the development industry.

Paragraphs 2.3 and 2.4 (City Region Deal) should be altered to make reference to potential and financial importance of a City Deal in delivering infrastructure.

##### Cramond & Barnton Community Council

LDPs should consider the adequacy of essential public services (e.g. GP services) to service residents' needs.

##### H&H Group Plc

Modify the Vision to include more specific guidance on infrastructure provision. Include guidance on how infrastructure is to be addressed at strategic and local level.

##### Homes for Scotland, Wallace Land Investment and Management

No modifications specified, representation indicates....

Include reference in the proposed plan to analysis/demand on secondary schools.

##### Mrs Jane Kellock

No modifications specified, representation indicates....

requirement for over 8,000 homes in West Lothian needs to be built in tandem with

health care provision.

Mactaggart & Mickel Homes

No modifications specified, representation indicates....  
further support should be given by the Plan for sites where there are infrastructure constraints.

NHS Lothian Public Health and Health Policy

Add new final sentence to Paragraph 6.3 to extend the requirement to provide infrastructure to include community facilities notably a hall or community meeting place.

Mrs Gail Reid

No modifications specified, representation indicates....  
development should be stopped until sufficient transport, pedestrian, services (education and medical) and infrastructure is provided.

The Trustees of Sir C.M. Dalrymple

Add new section after Section 3 in the proposed plan containing clear, costed funding and delivery strategy, with a separate, additional cost plan for individual projects. Revision of the Action Programme in relation to the provision of infrastructure, in particular, education and the approach to funding.

**Summary of responses (including reasons) by Planning Authority:**

**The Vision**

H&H Group Plc

SESplan disagree that the vision needs modifying to include more specific guidance on infrastructure provision. The role of the SDP is to provide direction to LDPs in the city region. This includes the delivery of strategic and cross-boundary transport infrastructure. However, it is the responsibility of individual local authorities to identify the impact of development within their area on non-strategic infrastructure, such education or GP surgeries and no direction on this matter is required within the SDP. **No modification proposed.**

**Non transport infrastructure – funding and delivery strategy**

Builyeon Farms LLP, CALA Management Ltd, The Trustees of Sir C.M. Dalrymple, Mrs Mirabelle Maslin

Education infrastructure is the responsibility of individual local authorities and is therefore not a strategic or cross-boundary requirement as identified by paragraph 2.2 of the Proposed Plan. Unless catchments cross authority boundaries, SESplan member authorities are not required to work together to deliver new schools. The impact of development on education infrastructure is dependent on the direct or cumulative impact of housing growth on individual Local Authorities education estates. It is the responsibility of individual LDPs and their respective Action Programmes to set policy for assessing the impact of development on infrastructure, and to set out mechanisms for delivery. **No modification proposed.**

The role of the Edinburgh and South East Scotland City Deal in funding infrastructure has not yet been agreed. Therefore it would not be appropriate to set

out any commitments at this stage. **No modification proposed.**

Builyeon Farms LLP, Mrs Gail Reid, Mactaggart & Mickel Homes

Where it is identified that new development will have an impact on infrastructure it is the responsibility of the developer to ensure that this impact is mitigated. It is not the responsibility of individual local authorities to fund the mitigation of new development, or fund in advance of development. **No modification proposed.**

North Dunfermline CCs & Halbeath TRA, Mrs Mirabelle Maslin

Development is required to deliver necessary infrastructure alongside development. Individual authorities assess local development infrastructure requirements, including health, education and transport. **No modification proposed.**

**Education – Secondary Schools**

Homes for Scotland, Wallace Land Investment & Management

SESplan disagree that there should be a reference in the proposed plan to analysis/demand on secondary schools. Education infrastructure is the responsibility of local authorities and is therefore not a strategic or cross-boundary requirement as identified by Par 2.2 of the plan. **No modification proposed.**

**Site specific Education – Winchburgh**

Winchburgh Developments Ltd

Requirements for the developer of the new school are set out in the planning consent and supporting Section 75 Agreement. The delivery of the new school is to be at developer expense. Action Programmes for each of the LDPs set out requirements for education and other infrastructure. **No modification proposed.**

**Healthcare and Community Facilities**

Mrs Jane Kellock, Cramond and Barnton Community Council, Dunbar Community Council, Mr Julian Siann

It is the responsibility of individual LDPs and their respective Action Programmes to set policy for assessing the impact of development on healthcare infrastructure working with community planning partners. LDPs and Action Programmes will set out the mechanisms for delivery of any required identified healthcare infrastructure, ahead of, or part of new development. **No modification proposed.**

NHS Lothian Public Health and Health Policy

Infrastructure associated with new development needs to meet the tests of Circular 3/2012, in that it is essential to mitigate the impact of development. These needs are best assessed at the local level. Therefore it is not for SESplan to set such requirements. **No modification proposed.**

**Other Issues**

Denholm and District Community Council

Housing site selection is undertaken during LDP preparation and this includes analysis of infrastructure. **No modification proposed.**

Dunbar Community Council

SESplan does not set out a requirement for 1,200 additional houses in Dunbar.

Dunbar specific matters are more appropriately addressed in East Lothian LDP. **No modification proposed.**

Mr Julian Siann

Social services is not a matter for a Strategic Development Plan. **No modification proposed.**

Rosewell & District Community Council,

Representation noted. **No modification proposed.**

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]

<b>Issue 17</b>	<b>Other Issues</b>	
<b>Development Plan reference:</b>	<b>Other/miscellaneous issues</b>	<b>Reporter: [Note: For DPEA use only.]</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Mr George Adam (037603)  Aithrie Estates (032643)  Builyeon Farms LLP (835897)  Mr Andrew Carnduff (035138)  Cala Management Ltd (929806)  A.J.C. Clark (930956)  Cockburn Association (037249)  Corstorphine Community Council ()  The Trustees of Sir C.M. Dalrymple (835899)  Edinburgh Association of Community Councils (040476)  Gladman Scotland (783418)  Grange and Prestonfield Community Council (790304)  Homes for Scotland (040551)  Juniper Green Community Council (028859)  Liberton and District Community Council (790396)  Mrs Mirabelle Maslin (928549)  Mr Colin McGrath (790749)  Midlothian Green Party (790754)  Murray Estates (930087)  Moorfoot Community Council (906008)  The National Trust for Scotland (040626)</p>	<p>Network Rail (928260)  NHS Lothian Public Health and Health Policy (840024)  North Berwick Community Council (035522)  Persimmon Homes (040349)  Police Scotland (040584)  Prestonpans Community Council (039835)  RSPB Scotland (031480)  Mrs Gail Reid (035887)  Royal Yachting Association (870419)  Scottish Enterprise (790575)  Scottish Environmental Protection Agency (790577)  Scottish Natural Heritage (790587)  Scottish Water (035737)  Shawfair LLP (039940)  Shell UK Ltd (832992)  South West Communities Forum (805601)  Stewart Milne Homes (930082)  Taylor Wimpey and Barratt Homes (040609)  Winchburgh Developments Ltd (832800)</p>	
<b>Provision of the Development Plan to which the issue relates:</b>	Other plan issues raised during consultation/other consultee responses.	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Mr George Adam</u>  The timescales for items 29 to 31 in the Action Plan are too far in the future and will only result in major problems for school infrastructure in Winchburgh (houses not selling because no transport) and blocking house building in Linlithgow (no school capacity).</p>		

### Aithrie Estates

Action Programme Action point No 29 is inaccurate regarding the proposed new rail station at Winchburgh. It is inaccurate to describe the proposed station as being required to support the ongoing development of the 'Winchburgh CDA' as any obligations regarding the rail station are obligations relevant to the whole CDA. The £10m required to be 'developer funded' is not accurate. The facility may not be funded wholly by a developer. The cost is not known. Delivery of the rail station is in Phase 2 and reaching that phase is dependent on clarification of the funding mechanism for the new secondary school Action Point 30. Regarding the new Winchburgh M9 junction contains errors regarding cost and timescale. A cost of £25m is disputed. The timing is dependent on Phase 2 being triggered and thereafter determined by 1,000 residential homes being occupied.

### Builyeon Farms LLP

Insufficient information in Action Programme on funding opportunities and progress on delivery by Local Authority area or strategic infrastructure topic. List of projects with limited supporting information not enough.

### Mr Andrew Carnduff

Plan does not include reference to harbours and coastline which are important for the economy, quality of life and tourism. The regions 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 activities. This could include tourism, ferries, wildlife watching, nature conservation, yacht cruising, long distance walking routes etc.

### Cala Management Ltd

Insufficient information in Action Programme on funding opportunities and progress on delivery by Local Authority area or strategic infrastructure topic. List of projects with limited supporting information not enough. Actions relating to Winchburgh are wrong regarding costing and timing of infrastructure. This could be resolved through a new section or separate supporting document that sets out a clear and costed funding and delivery strategy and a standalone costing plan detailing individual strategic projects to be agreed in advance with the development industry. It is not clear from the document what the strategic policies, proposals and recommendations are within the Plan. Simply bolding text is considered insufficient and vague.

### A.J.C. Clark

SDP2 should be set aside while a comprehensive assessment is made on the impact of Brexit.

### Cockburn Association

No reference in Plan to the visitor economy. Existing cultural assets and historic

sites in and around Edinburgh should be protected from excessive development. Development should not detract from natural environment and should add interest. Encourages the spread of cultural assets throughout the city.

Format of response for Proposed Plan confusing.

Figures difficult to interpret and graphics faint.

Corstorphine Community Council

Action programme: disappointed that routes may not be delivered to 2030. Non-car travel should be prioritised and has high cost/benefit ratios.

The Trustees of Sir C.M. Dalrymple

Insufficient information in Action Programme on funding opportunities and progress on delivery by Local Authority area or strategic infrastructure topic. List of projects with limited supporting information not enough.

Edinburgh Association of Community Councils, Grange and Prestonfield Community Council

SDP system is inflexible and cannot adapt to changing economic and governmental decisions. There is a need for 'a flexible ability' in the plan to respond and consider the impacts of change in a speedy manner.

Gladman Scotland

Annual Housing Land update (May 2015) is an apology for failing to deliver the housing requirements of SDP1 by stating delivery rates are unachievable. The tone of the Annual Housing Update seems designed to allow member authorities to "give up" on the, admittedly challenging, SDP1 housing land requirements and to just "Get-by" until the lower housing land requirements of SESplan 2 come into effect in 2018.

Homes for Scotland

Alternative Housing Supply Targets (HSTs) have not been assessed. Nowhere in the Environmental Report (ER) is there an analysis of the environmental implications of implementing the Wealth Distribution HNDA estimates in full. Same applies to setting the Edinburgh HST. ER provides no analysis of environmental implications of a higher generosity margin. (Taken from Homes for Scotland Appendix 4 - REF).

Juniper Green Community Council

Fairness needs to be inserted into the planning system by removing the option for repeated appeals and by listening to community concerns.

Liberton and District Community Council

Timescales for the proposed engagement need to be set now and before the next Local Development Plan.

Mrs Mirabelle Maslin

Monitoring/implementation - how can it be ensured that the Plan's requirements are not weakened or left unmet by Local Authorities? No, or inadequate, monitoring

takes place leading to poor development strategies. This is true of developments in Midlothian where weak approaches by Local Authorities has resulted in lack of greenspace and lack of developer contributions. 5 year plan updates are of limited value. Reviews should include possibility for a period delaying, slowing down or suspending growth. Should take time to deal with 'backlog' of issues. Local Authorities will not always be able to meet criteria.

Six week consultation period is insufficient.

Glossary - definitions required for: City Region, A701 relief road and A702 link.

#### Mr Colin McGrath

Looks for Scottish Borders to have its own separate Vision. Seeks for better and more effective means of engagement and consultation.

#### Midlothian Green Party

Support the early involvement of communities in the design of new developments and the alignment of LDPs with community plans. However this will require increased resources devoted to facilitating communities to engage.

#### Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes

Should use named policies rather than bold text, given plan's statutory function.

#### Moorfoot Community Council

Unclear what has changed in the Plan since the Main Issues Report making it difficult to comment on. Should set out what has changed and whose comments led to those changes.

#### Network Rail

Suggests introduction of Notification Zones for new development close to all operational railway infrastructure and strategic guidance to avoid development.

#### The National Trust for Scotland

Only limited treatment of culture, heritage and associated tourism in the Plan. This is a significant sector for the region's economy. Recommend Plan incorporates findings of the Environmental Report on this issue.

Limited relationship between SDP and LDPs, need to articulate how local planning will combine with regional planning and whether cross-boundary solutions can be developed.

#### NHS Lothian Public Health and Health Policy

Consultation Portal should be simplified. Responding across three sections of the consultation and sub-sections within these chapters is at odds with the approach to joined-up public policymaking that is required.

#### North Berwick Community Council

Concerned plan does not address coastal erosion. This is an oversight particularly in relation to North Berwick. Sewage system vulnerable.

#### Police Scotland

Police Scotland Fife Division will require to prepare for a number of factors likely to impact on policing including: Community engagement, cultural issues, cultural requirements and language issues; Recruitment Policy to consider diverse communities we serve; Crime trends targeting vulnerable members of our communities; Impact on existing custody arrangements and care provision in place; Continual evaluation of the service being provided by Fife Division, to ensure the high standards currently being received continue for expanding communities. This will involve effective resourcing, the streamlining of processes and ensuring value for money in the current financial climate; and Development of the working practices of Fife Division with partner agencies to ensure that we are effective in dealing with the evolving demographics within Fife. The opening of the Queensferry Crossing will likely have an impact on demand in respect of vulnerable missing persons and those presenting as suicidal, with the Forth Road Bridge currently a site of concern. Police Scotland is currently in the process of considering a 10-year-strategic forecast under the auspices of the Policing 2026 programme. The work being undertaken by the Policing 2026 programme considers the themes of the SESplan proposal by carrying out long term horizon scanning and prioritising potential impacts.

#### Prestonpans Community Council

Plan makes no reference to Scottish Planning Policies, nor to designations other than Green Belt.

#### Mrs Gail Reid

Consultation process confusing, complicated and overly technical. Form is complicated asking for opinion and solutions. Consultation process requires substantial time and technical knowledge making it hard to engage. Public consultation events should be more frequent with more varied times.

#### RSPB Scotland

Plan lacks recognition that change needs to be delivered with nature and low carbon options in mind, options should consider the potential impacts on protected areas and important local populations of species.

#### Royal Yachting Association

No reference is made to the National Marine Plan in the Proposed Plan including coordination with terrestrial planning. There are also issues to do with protecting coastal infrastructure, such as harbours and marinas from coastal erosion, sea level rise and storm surges.

#### Scottish Enterprise

Action Programme should more clearly reflect that much of the key infrastructure investment delivery and implementation at this juncture relies quite heavily, and is dependent on, City Deal.

#### Scottish Environmental Protection Agency

Proposed Plan should make reference to the 11 Air Quality Management Areas in West Lothian, Fife, Edinburgh and East Lothian. SESplan Action Programme

should set out actions aimed at reducing levels of pollution.

#### Scottish Natural Heritage

National Marine Plan gives spatial steer for port and land based infrastructure for offshore renewables and carbon capture and storage network. This could be included in Action Programme under actions 3 and 4. SESplan could direct Local Authorities to work with Marine Scotland to develop a more detailed strategy for marine/coastal issues to give offshore developers and investors more certainty.

HRA - consider that some discussion on the outcome of the screening process for in-combination effects is required and recommend that the post-examination update includes this. SESplan's role should be in setting what a range of suitable mitigation measures would be for Local Development Plan HRAs and these should be restated for SDP2.

Update Action Programme to take account of linked active travel and transport projects including Orbital Bus and Orbital Cycle Route and A801 Improvements

#### Scottish Water

Supports general approach of the Strategic Flood Risk Assessment but recommend that the definition of sewer flooding is updated to be more in line with the SEPA definition.

#### Shawfair LLP

Proposed Plan should place greater emphasis on a new delivery mechanism as set out in the Review of the Planning System materialising. Consider that more emphasis should be placed on infrastructure challenge and that the Proposed Plan should to go further in offering support to allocated sites where there are infrastructure constraints.

#### Shell UK Ltd

Should identify and safeguard oil and gas pipelines in line with SPP paragraph 99 which requires Strategic Development Plans to identify nationally important clusters if industries handling hazardous substances and safeguard these from development which could compromise their continued operation or expansion. Paragraph 107 of SPP also requires developments to take into account potential impacts on major-accident hazard sites. The Proposed Plan should accord to both of these and requirements of Planning Circular 3/2015: Planning Controls for Hazardous Substances (REF) and European Directive 2012/18/EU (REF). Oil and gas pipelines should be considered a strategic cross-boundary issue, particularly considering their impact on the economy.

#### South West Communities Forum

Add definition of World Heritage Site to the Glossary.

All growth options in Strategic Environmental Assessment show negative impacts including promoting unsustainable development and lack of regard for future food production. Climate change issues are not being considered.

### Winchburgh Developments Ltd

Reference to Winchburgh Rail Station in the Proposed Plan Action Programme (point 29) being wholly developer funded is incorrect. Funding could come from others sources e.g. Scottish Government Station Fund. Winchburgh Developments Ltd. should be listed as the developer. The timescale for the Winchburgh M9 Junction in the Proposed Plan Action Programme (point 30) is wrong. Timescale should be in the next five years. Costs for delivery of junction improvements are incorrect and do not compare to Winchburgh Developments Ltd.'s costings. Improvements required are limited to two new roundabouts/slip roads at a location with grade separation already in place. Winchburgh Developments Ltd. should be listed as the developer. Action point 28, in relation to park and ride sites lacks credible financial information and double counts Winchburgh works in points 29 and 30.

### **Modifications sought by those submitting representations:**

#### Mr George Adam

No modification specified, however, representation indicates Action Programme points 29 – 31 timescales be revised as they are too far in the future.

#### Aithrie Estates

Amend Action Programme points 29 and 30 to show more accurate information.

#### Builyeon Farms LLP

No modifications specified, however response implies revision of the Action Programme in relation to the provision of infrastructure, in particular, education and the approach to funding.

#### Mr Andrew Carnduff

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. Request that a cluster be identified for sea coast activity and related onshore activities.

At para. 4.8 and 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".

Glossary definitions - Blue Infrastructure should additionally include "the Firth of Forth, the sea, and their adjacent coastal margins". Green Belt should have inserted "and coasts". Green Infrastructure should have inserted "sea and coastal margins" In the Infrastructure definition, the word "harbours" should be inserted before ... etc.

#### Cala Management Ltd

Add new section to Action Programme or separate supporting document that sets out a clear and costed funding and delivery strategy and a standalone costing plan detailing individual strategic projects to be agreed in advance with the development industry.

The presentation of the Plan must be clearer in its policy framework – simply

bolding text is considered insufficient and vague. Paragraphs 2.1 and 2.2 should be amended to clearly set out policies and proposals.

A.J.C. Clark

Work on SDP2 should be suspended while a comprehensive assessment is made on the impact of Brexit.

Cockburn Association

No modification specified, representation indicates a simpler form of consultation response should be used, similar to that used for responding to the Main Issues Report.

Corstorphine Community Council

Modify timescales in the action programme to shorten delivery times for active travel routes.

The Trustees of Sir C.M. Dalrymple

No modifications specified, response implies revision of the Action Programme in relation to the provision of infrastructure, in particular, education and the approach to funding.

Edinburgh Association of Community Councils, Grange and Prestonfield Community Council

SDP should have in-built flexibility which could take account of change and cascade this to development and infrastructure priorities.

Juniper Green Community Council

No modification specified, representation indicates that fairness needs to be inserted into the planning system by removing the option for repeated appeal and by listening to community concerns.

Liberton and District Community Council

Timescales for the proposed engagement need to be set now and before the next LDP.

Mrs Mirabelle Maslin

Add: City Region, A701 relief road, A702 link to glossary.

Mr Colin McGrath

Scottish Borders to have its own separate Vision. Seeks for better and more effective means of engagement and consultation.

Midlothian Green Party

Support the early involvement of communities in the design of new developments and the alignment of LDPs with community plans. However this will require increased resources devoted to facilitating communities to engage.

Murray Estates

Should use named policies rather than bold text, given plan's statutory function.

Moorfoot Community Council

Not clear what has changed in the Plan since the Main Issues Report making it difficult to comment on. Should set out what has changed and whose comments led to those changes.

The National Trust for Scotland

Economy: Recommend Plan incorporates findings of the Environmental Report on culture, heritage and associated tourism. Need to articulate more clearly how local planning will combine with regional planning and whether cross-boundary solutions can be developed.

Network Rail

Level Crossings - no modification specified, representation indicates that the Plan should provide strategic guidance for LDP spatial strategies to avoid allocating development required to use level crossings.

Notification Zones no modification specified, representation indicates that the Plan should provide a strategic context for LDPs to provide a designated notification zone around all operational railway infrastructure within which any development application proposals would be notified to Network Rail. This would be similar to oil and gas pipeline policy.

NHS Lothian Public Health and Health Policy

No modification specified, representation indicates a more streamlined way of consultation and responding to the plan would be beneficial.

North Berwick Community Council

Should include consideration of the issue of coastal erosion. We would like to see a commitment from all authorities in the SES region to developing creative and innovative ways to protect our coastline.

Persimmon Homes

Should use named policies rather than bold text, given plan's statutory function.

Prestonpans Community Council

Should acknowledge the value of designations and policies which are there to protect Listed Buildings and their wider settings, Conservation Areas, Battlefield Sites, prime agricultural land and more should be explicitly mentioned.

Mrs Gail Reid

Consultation process needs to be streamlined/simplified to make it easier and less time consuming to engage. Public consultation events should be more frequent with varied times.

RSPB Scotland

Add reference to the need to consider impacts on nature and protected areas.

Royal Yachting Association

No modification specified, representation implies plan should be modified to include reference to the National Marine Plan.

### Scottish Enterprise

Action Programme should more clearly reflect that much of the key infrastructure investment delivery and implementation at this juncture relies quite heavily, and is dependent on, City Deal.

### Scottish Environmental Protection Agency

Should make reference to the 11 Air Quality Management Areas in West Lothian, Fife, Edinburgh and East Lothian.

Action Programme should be used to establish a requirement that only buses with the highest EURO specification or zero emissions technology should be used on busy commuter routes, in order to alleviate air pollution in urban areas.

### Scottish Natural Heritage

Action Programme: National Marine Plan gives spatial steer for port and land based infrastructure for offshore renewables and carbon capture and storage network. This could be included in Action Programme under actions 3 and 4. Update to take account of linked active travel and transport projects including Orbital Bus and Orbital Cycle Route and A801 Improvements.

Coast/Marine: SESplan could direct Local Authorities to work with Marine Scotland to develop a more detailed strategy for marine/coastal issues to give offshore developers and investors more certainty.

### Scottish Water

Amend section 1.8 of Strategic Flood Risk Assessment to "Sewer flooding is often closely linked to surface water flooding, and may contain untreated foul water".

### Shell UK Ltd

Should set out a policy to recognise and safeguard oil and gas pipelines as a strategically important transportation facility and guide any proposed development near the existing pipelines which run through the SESplan area. Policy should provide strategic locational guidance for any new development proposed near existing pipelines and reference Health and Safety Executive Planning Advice for Developments near Hazardous Installations Guidelines (REF). Request that new or expanded strategic development allocations are subject to appropriate assessment and full recognition given to existing oil and gas pipelines.

### South West Communities Forum

Add definition of World Heritage Site to the Glossary.

### Stewart Milne Homes

Should use named policies rather than bold text, given plan's statutory function.

### Taylor Wimpey and Barratt Homes

Should use named policies rather than bold text, given plan's statutory function.

### Winchburgh Developments Ltd

Add additional point to Action Programme as follows: Winchburgh non-denominational secondary school provision Action Point Winchburgh secondary school delivery. Action to co-fund delivery of new non-denominational and

denominational secondary school provision at Winchburgh to enable the implementation of the Development Plan housing strategy for the eastern sector of West Lothian Council. Timescale “2016-2020 Leads and Partners“ West Lothian Council, Scottish Government, Winchburgh Developments Ltd, third party investors and developers Costs and funding “estimated at £21m for Phase 1 secondary school provision Progress “ Action required immediately.

**Summary of responses (including reasons) by Planning Authority:**

**Action Programme**

Mr George Adam, Builyeon Farms LLP, Aithrie Estates, Cala Management Ltd, Corstorphine Community Council, The Trustees of Sir C.M. Dalrymple, Scottish Enterprise, Scottish Natural Heritage, Winchburgh Developments Ltd

The SESplan Action Programme is prepared in line with Scottish Government requirement for Action Programmes. It focuses on national, regional and cross boundary matters, the latter of which requires more than one of the SESplan authorities to work together to deliver it. All other infrastructure and delivery matters will be addressed in individual LDP Action Programmes, including the delivery of secondary schools.

Page 3 of the Action Programme sets out the development process. It is accepted that information will change over time, including the detail on City Deal related programmes. Comments on action programme content will be reviewed when the updated Action Programme produced within three months of plan approval (expected May 2018). Timescales of many projects are current not yet identified and therefore the default of 2018-2030 has been used. **No modification proposed.**

Scottish Environment Protection Agency

Specification of buses is a matter for SEStran, transport providers and individual authorities, not the Strategic Development Plan. **No modification proposed.**

**Consultation, Engagement and Process**

Cockburn Association, Juniper Green Community Council, Liberton and District Community Council, Mrs Mirabelle Maslin, Mr Colin McGrath, Moorfoot Community Council, NHS Lothian Public Health and Health Policy, Mrs Gail Reid, Midlothian Green Party

The Proposed Plan (2016), Main Issues Report (2015) and early Influence the Plan (2014) presented opportunities for all stakeholders to engage and influence the preparation of the second Strategic Development Plan at different stages. They also provided different means to engage including surveys, workshops, drop-in sessions and presentations. During the Main Issues Report a substantial number of events took place across the region at different times of the day,

SESplan sets out in an annual Development Plan Scheme (DPS) a Participation Statement stating how the SDPA will ensure there are opportunities for all stakeholders to participate in the plan preparation. The DPS also sets out a timetable for key documents and their consultation.

The consultation on the Proposed Plan met the statutory timescales as set out by

the Scottish Government and it is considered that opportunities have been made throughout the process for engagement in the plan's preparation.

The format of responding to issues and proposing modifications at Proposed Plan stage are also requirements set out by the Scottish Government. This process is followed to ensure there is a formal means for responding to and taking account of comments where relevant.

The Main Issues Report is not in itself a proposed plan. It sets out options and preferred options for the direction and content of a proposed plan, therefore, a list of changes between the two documents would not be well-matched. Comments on the MIR were reported to SESplan's Joint Committee in December 2015 and informed development of the proposed plan.

Engagement in LDP preparation is a matter for member authorities.

5 year plan updates are in line with requirements of SPP.

The process of appeals on planning applications is set out by the Scottish Government and SDP cannot alter this process, however an up to date development plan has the ability to give greater certainty on the outcome of appeals. **No modification proposed.**

#### **Plan policy**

Cala Management Ltd, Murray Estates, Persimmon Homes, Stewart Milne Homes, Taylor Wimpey and Barratt Homes

Disagree with proposed modification. The proposed plan has made a deliberate shift away from the 15 named policies contained in SDP1. This was an intentional move to make SDP2 more accessible and readable for all users and give the entire document greater relevance. Member authorities and decision makers are required to give due consideration to all provisions of a statutory development plan, not just named policies or policy direction in bold. However, clear, specific directions to member authorities and LDPs have been highlighted throughout the plan in bold in the interests of clarity. LDPs have to comply with SPDs. **No modification proposed.**

Edinburgh Association of Community Councils, Grange and Prestonfield Community Council

Note the response. To ensure that the plan is kept up to date, it must be reviewed within four years of its approval. The Action Plan will be reviewed by the SDPA every two years. **No modification proposed.**

#### Network Rail

SESplan note the response but would consider any new or emerging policy on notification zones requires to be designed and implemented at a national policy level, in the interests of consistency given the cross boundary nature of the rail network. It is not the role of the SDP to examine this specific detailed level of policy. **No modification proposed.**

Prestonpans Community Council

The plan is intended to be a concise, visionary, map based document which identifies key areas for growth and locations for investment. The plan is prepared based on the requirement of SPP, NPF3 and relevant legislation. SDP are not required to repeat national policy already contained in SPP. Specific details on Green Belt are considered a matter for LDPs to address, in conjunction with National Planning Policy, 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. The Placemaking section of the plan (pages 16 – 17) contains a clear directive in relation to agricultural land. **No modification proposed.**

Mr Andrew Carnduff, Royal Yachting Association, Scottish Natural Heritage

Disagree with proposed modification. SESplan is intended to be a concise, visionary, map based document. The proposed plan reflects SPP and the NPF. NPF3 states that National and Regional Marine Plans should also be taken into account where relevant and SESplan recognise that consistency will be important in this and future plans between marine and terrestrial plans. Ports and Harbours are also identified in the proposed plan in Table 4.1 Significant Business Clusters. **No modification proposed.**

Shell UK Ltd

Disagree with proposed modification. The plan is intended to be a concise, visionary, map based document which identifies key areas for growth and locations for investment. It is not the role of SDP to repeat other requirements and legislation. New development proposals will continue to be assessed at LDP level, in line with National Planning Policy, 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.**

National Trust for Scotland

Disagree with proposed modification. The NPF clearly sets out how local planning combines with regional planning. There are numerous examples of strategic cross-boundary projects which can be drawn upon for best practice examples. Action Programmes are also instrumental in supporting cross boundary initiatives. **No modification proposed.**

**Environment**

North Berwick Community Council

Disagree with proposed modification. LDPs will continue to recognise and utilise international, national and local natural heritage designations to conserve and protect the natural environment. Coastal erosion is also covered by other legislation, therefore unsure as to what value would be added by adding this to the proposed plan. Sewage systems are the responsibility of developers and Scottish Water. **No modification proposed.**

#### RSPB Scotland

Disagree with proposed modification. This is considered a matter for LDPs to address, in conjunction with National Planning Policy, 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 Environmental Protection Agency

Disagree with proposed modification. Table 3.1 of the Environmental Report (October 2016) references the Air Quality Management Areas. This has informed the Spatial Strategy for SDP2 which seeks to promote modal shift, sustainable travel, active travel alternatives and a reduction in CO<sub>2</sub> emissions. The Proposed Plan reflects SPP and NPF3, including a commitment to reducing transport related emissions. However, there is currently no obligation for a Strategic Development Plan to contain targets relating to emissions. **No modification proposed.**

#### Scottish Water

The Strategic Flood Risk Assessment has been updated as part of the submission of the proposed plan. **No modification proposed.**

#### **Glossary definitions**

##### Mr Andrew Carnduff

Disagree with proposed modifications. SESplan do not support suggested additions to Glossary definitions. **No modification proposed.**

##### Mrs Mirabelle Maslin

Disagree with proposed modification. SESplan do not consider there is a requirement to add the terms 'City Region', 'A701 relief road', or 'A702 link' to the glossary. Terms are considered self-explanatory. **No modification proposed.**

##### South West Communities Forum

Disagree with proposed modification. SESplan do not consider there is a requirement to add the terms 'World Heritage Site' to the glossary. The term is considered sufficiently well used and self-explanatory – it is not considered so technical or specialised that a glossary definition is required. **No modification proposed.**

#### **Strategic Environmental Assessment**

##### Homes for Scotland

Environmental Assessment is required to assess reasonable alternatives. The full Wealth Distribution estimate is not a reasonable alternative as a HST. This is because it is not a deliverable HST due to the level of funding to deliver affordable housing (reasoning set out in the Housing Background Paper and Issue 8 S4). As the combined HST is short of the HNDA estimate, the HST is set at the maximum, reasonable and deliverable level within resources to deliver the plan.

Regarding alternative Edinburgh HSTs, the alternative spatial strategies considered in the Interim Environmental Report (IER) has different housing land

take impacts for the SESplan Member Authorities - See appendix D of IER and now ER. Option 1A for City of Edinburgh required significant additional new housing land supply above that required by the Proposed Plan HST. This identified that there would be significant negative impacts on the following SEA objectives: Protect and enhance natural heritage assets; Protect and enhance the landscape and townscape; To use resources sustainably; To minimise the impacts on soil quality and adhere to contaminate land regulations; and Minimise flood risk and adverse significant effects on water bodies. Therefore whilst the numbers do not exactly match the scale of housing in the Wealth Distribution estimate, higher HSTs for City of Edinburgh have been assessed.

The generosity margin does not require assessment in the ER as it relates to providing land for the HST to be met. It is not to provide additional housing above the HSTs to be built. Therefore the realised impacts between 20% and 10% margins would not be different unless less suitable sites were required to be identified due to need to have greater land supply due to higher generosity margin. **No modification proposed.**

#### South West Communities Forum

Soil quality, minimising loss of prime quality agricultural land and climatic factors are objectives and/or sub-objectives set out in the SEA framework. The overall Strategy Assessment indicates a range of positive neutral and negative impacts on SEA objectives. **No modification proposed.**

#### **Other issues**

##### A.J.C. Clark

Disagree with proposed modification. It is too early to predict the impact of BREXIT on the SESplan area. SESplan have a duty to meet statutory timescales and the proposed plan has been based on the most recent and up to date information available. The Strategic Development Planning Authority for SESplan has a duty to pass the proposed plan to Scottish Government by end of June 2017 for examination. SESplan are committed to meeting timescales and preventing delay of the proposed plan. **No modification proposed.**

##### Cockburn Association

The visitor economy is referenced at the beginning of the proposed plan in the SESplan Assets pages. Tourism is also specifically referenced elsewhere in the plan in Table 4.1 Significant Business Clusters. **No modification proposed.**

##### Gladman Scotland

The representation refers to the Annual Housing Land Update from May 2015 which is a separate document and is not part of the proposed plan. **No modification proposed.**

##### Mr Colin McGrath

Disagree with proposed modification. The Planning etc. (Scotland) Act 2006 requires the SDP to set out a Vision which represents a broad statement of SESplan's view as to how the SESplan area should develop. Multiple Vision statements would therefore be inappropriate, and would defeat the purpose and

aims of strategic level planning. The Scottish Borders LDP will also have its own vision for The Borders. **No modification proposed.**

The National Trust for Scotland

Disagree with proposed modification. The plan makes clear, early reference to cultural and heritage assets (page 4-5 SESplan Assets), including tourism assets. 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.' Opportunities for tourism are also highlighted in Table 4.1 Significant Business Clusters (pages 32-33). 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. The findings of the environmental report in relation to culture and heritage are reflected in the placemaking principles of the proposed plan. **No modification proposed.**

Ocean Terminal Ltd

Matter is more appropriately set out in City of Edinburgh LDP and accompanying Action Programme. **No modification proposed.**

Shawfair LLP

It is premature to refer to eventual outcomes of the planning review at this stage, including potential infrastructure funding mechanisms. SESplan appreciates current challenges in delivering infrastructure but this matter is more appropriately set out in action programmes. Delivery of individual sites is a matter for member authorities and their Action Programmes. **No modification proposed.**

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]



# Statement of Conformity with the Participation Statement

## Background

In March 2016 SESplan, the Strategic Development Planning Authority for South East Scotland, published Development Plan Scheme number 8. This contained a Participation Statement which covered the Proposed Strategic Development Plan publication period for consultation.

This Statement of Conformity with the Participation Statement has been prepared to describe what actions SESplan took during preparation of the Proposed Strategic Development Plan in line with the Participation Statement.

## Participation Statement

The Participation Statement set out how, when and with whom consultation on the Proposed Plan would take place. As set out in Planning Circular 6/2013: Development Planning, consultation is expected to be meaningful and authorities are to employ a range of techniques and activities for stakeholders which are tailored to local circumstances.

SESplan set out an overarching aim in the Participation Statement to:

***'...raise awareness of Strategic Development Planning in SESplan while engaging and involving key stakeholders throughout the plan making process.'***

In addition, SESplan set out thirteen objectives to achieve this aim and ensure engagement in the plan.

The pages overleaf set out the aims and objectives of the Participation Statement and how SESplan have achieved these.

## Participation Statement

Aim and Objectives		
<p><b>'...raise awareness of Strategic Development Planning in SESplan while engaging and involving key stakeholders throughout the plan making process.'</b></p>		
1.	Develop awareness of SESplan through communication and promotion	✓
2.	Seek ways to engage with and involve key stakeholders throughout the whole process of producing the Strategic Development Plan	✓
3.	Make information available as early as possible	✓
4.	Produce information in an easy to use format	✓
5.	Ensure that arrangements for participation are as inclusive and open as possible	✓
6.	Offer the opportunity to be involved to as many stakeholders as possible	✓
7.	Make extensive use of electronic communication including our website, social media, consultation portal and those of our Local Authority partners, to promote plan awareness and encourage engagement	✓
8.	Build on existing partnerships and working relationships, for example with key agencies and regional economic groups, to facilitate greater input;	✓
9.	Develop individual strategies on how best to engage with key stakeholders, recognising the limitations of a one size fits all approach	✓
10.	Look to guidance, such as that provided by PAS (Planning Aid Scotland) and other resources, when completing and assessing our engagement plans and actions	✓
11.	Make our engagement plans public documents available before periods of engagement	✓
12.	Ensure material is written in clear, plain English with attractive and effective graphics	✓
13.	Communicate with stakeholders throughout the consultation process and provide updates as the plan progresses	✓

## Key Proposed Plan Activities

SESplan have employed a range of techniques to promote the Proposed Plan to ensure coverage of different stakeholders and demographics. These have included:

- updating our website to become more user friendly and making it clear where people can access the Proposed Plan;
- use of social media in particular twitter to promote the plan at all stages (noting that our followers have significantly increased);
- use of posters in libraries and council buildings;
- emails and letters sent to everyone on the SESplan database (over 1000 individuals and groups);
- emails and letters sent to everyone on LDP databases of our member authorities;
- an attractive SESplan Proposed Plan leaflet was produced giving an 'easy read' explanation of what the plan did, who SESplan are, how and when to respond and how to contact us;
- over 250 Community Councils in the region sent an information pack containing a copy of the Proposed Plan, SESplan Proposed Plan leaflet and posters they could use;
- public events took place in each of the six member authorities including a drop-in session, presentation and Q&A. All documents and large format diagrams were made available and members of SESplan and LDP teams were in attendance to answer questions;
- three press releases, a press advert and notice on Tell Me Scotland were used to promote the publication of the plan;
- copies of the plan were made available in council offices and all libraries in the region; and,
- in addition, the Proposed Plan was made available on our website two months before publication started and we wrote to everyone who had previously responded to a SESplan consultation to let them know.

## Best Practice

To aid engagement SESplan prepared an overarching Stakeholder Strategy and Proposed Plan Engagement Action Programme and made these publically available in advance of the publication of the plan. These looked at how we would engage with particular stakeholders. Comments on these documents were also invited.

SESplan also assessed the proposed actions of the Proposed Plan consultation against PAS's SP=EED principles to ensure the activities met with best practice advice.

### Plan Production

- SESplan worked with A+DS to storyboard the plan to make it a concise, graphics based and well laid out document which would be easy to find information in. Specifically, we used colour coding to sections, produced a 'vision index' page aligning the content of the vision with the content of the plan and produced a series of infographics;
- Diagrams and maps were produced with the aim of using a consistent format that was attractive and conveyed complex spatial planning information in an understandable way;
- SESplan worked to plain English guidance on writing to ensure the text could be as accessible as it could be;
- Formal policy boxes were taken out to avoid unnecessary repetition and improve the narrative and flow of text.

### Proposed Plan Consultation

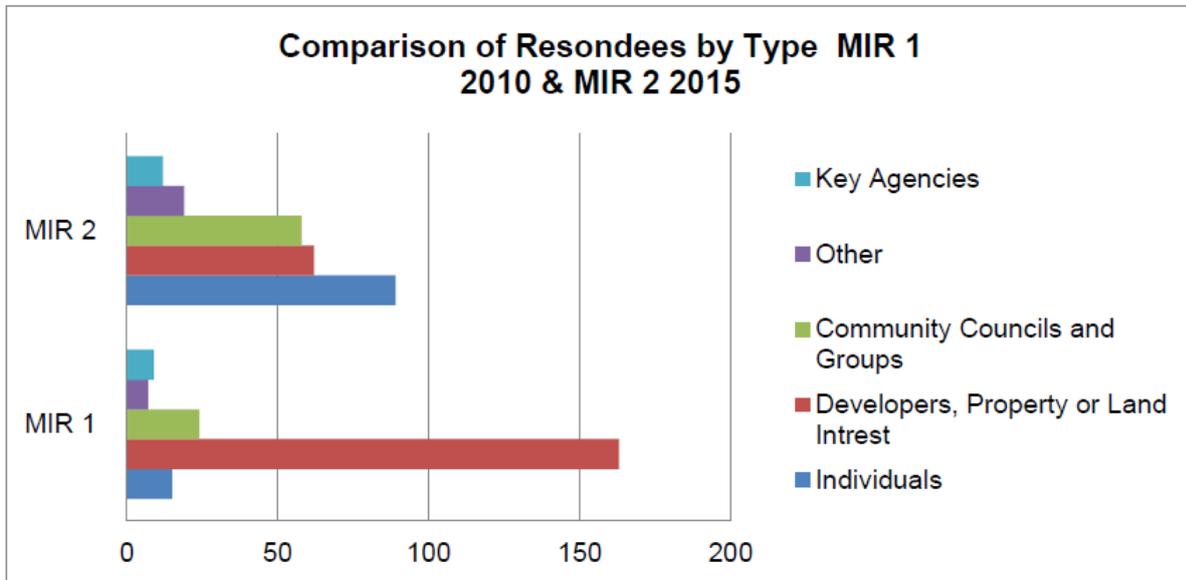
SESplan's consultation during the preparation of the proposed plan took the form of three stages. This included early engagement through a survey prior to the Main Issues Report in 2014, an extended period of consultation including public events for the Main Issues Report in 2015 and further public events as part of the Proposed Plan Publication in 2016. Meetings and workshops also took place throughout the period with Key Agencies and other stakeholders.

### Consultation Stages

What	How	When
'Influence the Plan' early engagement	Online survey based poll asking seven questions using radio buttons and free text boxes.	Six weeks - April to May 2014
Main Issues Report	Extensive consultation period with 26 public events, online consultation portal and Easy Read Guide.	Ten weeks – July to September 2015
Proposed Strategic Development Plan	Formal consultation period with 6 public events, online consultation portal.	Six weeks – October to November 2016

## Key Achievements

SEsplan have succeeded in increasing the number of individuals and community groups who have made comment on Plan documents or attended consultation events. It is considered that this increased engagement demonstrates that the general public have become more aware of the SDP and SEsplan than when SDP1 was prepared.



## Conclusion

It is considered that SEsplan have successfully achieved the aims and objectives of the Participation Statement as set out with Development Plan Scheme. SEsplan have used a variety of innovative as well as well tested methods of engagement and have exceeded minimum requirements at all stages in the preparation of the replacement Strategic Development Plan.

## APPENDICES

- **Appendix 1: List of Public Events and Photographs**
- **Appendix 2: Event Posters**
- **Appendix 3: Proposed Plan Leaflet**
- **Appendix 4: Proposed Plan Infographoc**
- **Appendix 5: Newspaper Adverts**
- **Appendix 6: Main Issues Report Leaflet and Easy Read Guide (including infographic)**

### Appendix 1: List of Public Events - Proposed Plan

Event:	Venue:	Date & Time:
Consultation Drop-in, Presentation and Q&A	City Chambers, Kirkgate, Dunfermline	Monday 24 <sup>th</sup> October 2016 3pm-8pm
Consultation Drop-in, Presentation and Q&A	Lasswade Centre, Eskdale Drive, Midlothian	Wednesday 26 <sup>th</sup> October 2016 3pm-8pm
Consultation Drop-in, Presentation and Q&A	West Lothian Civic Centre, Howden South Road, Livingston	Thursday 3 <sup>rd</sup> November 2016 3pm-8pm
Consultation Drop-in, Presentation and Q&A	City Chambers, High Street, Edinburgh	Monday 7 <sup>th</sup> November 2016 3pm-8pm
Consultation Drop-in, Presentation and Q&A	Brunton Theatre, Ladywell Way, Musselburgh	Wednesday 9 <sup>th</sup> November 2016 3pm-8pm
Consultation Drop-in, Presentation and Q&A	Council Headquarters, Bowden Road, Newtown St. Boswells	Thursday 10 <sup>th</sup> November 2016 3pm-8pm

### List of Public Events - Main Issues Report

Event:	Venue:	Date & Time:
Public Drop-In	Town House, High Street, Haddington	Thursday 30 <sup>th</sup> July 2015, 3-7pm
Community Council Event - Presentation and Q&A	Town House, High Street, Haddington	Tuesday 4 <sup>th</sup> August 2015, 6.30-8.30pm
Public Drop-in	Brunton Hall, Ladywell Way, Musselburgh	Wednesday 5 <sup>th</sup> August 2015, 3-7pm
Public Drop-in	Drumbrae Library, Drum Brae Drive, Edinburgh	Thursday 6 <sup>th</sup> August 2015, 3-7pm
Public Drop-in	West Lothian Civic Centre, Howden South Road, Livingston	Monday 10 <sup>th</sup> August 2015, 2-7pm
Community Council - Presentation and Q&A	Dalkeith Arts Centre, White Hart Street, Dalkeith	Tuesday 18 <sup>th</sup> August 2015, 5-7pm
Fife Council Public Drop-in	Dunfermline City Chambers, Kirkgate, Dunfermline	Thursday 20 <sup>th</sup> August 2015, 3-7pm
Community Council	Burgh Halls, The Cross,	Thursday 20 <sup>th</sup> August

event - Presentation and Q&A	Linlithgow	2015, 6-8pm
Community Council event - Presentation and Q&A	St Thomas Church Hall, Glasgow Road, Edinburgh	Monday 24 <sup>th</sup> August 2015, 6-8pm
CEC Staff Briefing	Waverley Court, East Market Street, Edinburgh	Tuesday 25 <sup>th</sup> August 2015, am
Elected Members Briefing Meeting	Council Chambers, Newtown Street, Duns	Wednesday 26 <sup>th</sup> August 2015, 2pm
Scottish Borders Community Councils - Presentation and Q&A	Council Chambers, Newtown Street, Duns	Wednesday 26 <sup>th</sup> August 2015, 6.30-8.30pm
Community Council - Presentation and Q&A	Waverley Court, East Market Street, Edinburgh	Thursday 27 <sup>th</sup> August 2015, 6-8pm
Elected Members Briefing Meeting	Fife House, North Street, Glenrothes	Monday 31 <sup>st</sup> August 2015, pm
Community Council event - Presentation and Q&A	Partnership Centre, South Bridge Street, Bathgate	Tuesday 1 <sup>st</sup> September 2015, 6-8pm
Community Council event - Presentation and Q&A	Portobello Town Hall, Portobello High Street, Edinburgh	Wednesday 2 <sup>nd</sup> September 2015, 6-8pm
Community Council event - Presentation and Q&A	Waverley Court, East Market Street, Edinburgh	Thursday 3 <sup>rs</sup> September 2015, 6-8pm
A Place for Communities Public Seminar	Chartered Institute of Housing, Princes Street, Edinburgh	Friday 4 <sup>th</sup> September 2015, 9.30am-1pm
Community Planning Partnership Event	Gibson Craig Hall, Lanark Road West, Currie	Monday 7 <sup>th</sup> September 2015, 2-5pm
Community Council event - Presentation and Q&A	Gibson Craig Hall, Lanark Road West, Currie	Monday 7 <sup>th</sup> September 2015, 6-8pm
Community Councils Meeting - Presentation and Q&A	Council Headquarters, Bowden Road, Newtown St. Boswells	Tuesday 8 <sup>th</sup> September 2015, 6.30-8.30pm
Place to do Business Public Seminar	Scottish Enterprise, Apex House, Haymarket Terrace, Edinburgh	Tuesday 8 <sup>th</sup> September 2015, 1.30-4.30pm
Community Council event - Presentation and Q&A	Business Centre, City Chambers, High Street, Edinburgh	Wednesday 9 <sup>th</sup> September 2015, 6-8pm
Community Councils and Public event - Presentation and Q&A	Council Chambers, Rosetta Road, Peebles	Thursday 10 <sup>th</sup> September 2015, 6.30-8.30pm

A Better Connected Place Public Seminar	City Chambers, High Street, Edinburgh	Monday 14 <sup>th</sup> September 2015 9.30am-1pm
Public Drop-in	Inverkeithing Civic Centre, Queen Street, Inverkeithing	Monday 14 <sup>th</sup> September 2015, 3-7pm
Public Drop-in	Lasswade High School, Eskdale Drive, Midlothian	Wednesday 16 <sup>th</sup> September 2015, 3-7pm
Midlothian Federation of Community Councils event - Presentation and Q&A	Middleton Village Hall, Borthwick Castle Terrace, Midlothian	Wednesday 16 <sup>th</sup> September 2015, 7pm



**Photographs from consultation events (L-R):**

Event set up Inverkeithing; Promotional banners Waverley Station, Edinburgh; Place for Communities Public Seminar featuring Malcom Fraser; map voting and comments Haddington; Breakout discussions Place to do Business Public Seminar and Public drop-in discussions Musselburgh.



## Proposed Strategic Development Plan

Consultation 13 October - 24 November 2016



*SESplan sets a vision for housing, transport and green infrastructure across the region over the next 20 years.*

You can read the plan online at [www.sesplan.gov.uk](http://www.sesplan.gov.uk), in local libraries and local planning offices or you can come and talk to us at one of our events:

- Monday 24 October**, City Chambers, **Dunfermline**
- Wednesday 26 October**, Lasswade Centre, **Bonnyrigg**
- Thursday 3 November**, West Lothian Civic Centre, **Livingston**
- Monday 7 November**, City Chambers, **Edinburgh**
- Wednesday 9 November**, Brunton Theatre, **Musselburgh**
- Thursday 10 November**, Council Headquarters, **Newtown St. Boswells**

All events open to everyone. Drop-in 3pm to 6.30pm or come along for the presentation with Q&A at 6.30pm (please note spaces may be limited for the presentation, so let us know if you want to come along using the contact details below).

For more information and how to respond to the plan, please visit [www.sesplan.gov.uk](http://www.sesplan.gov.uk), email [contactus@sesplan.gov.uk](mailto:contactus@sesplan.gov.uk) or call us on 01506 282883.




## SESplan Main Issues Report Consultation

Over the next 20 years the Edinburgh and South East Scotland region faces some important challenges –

- Population and household growth;
- Environmental concerns; and
- Infrastructure constraints.

You can speak to the SESplan team about these challenges at:

**Drumbrae Library**  
**Edinburgh**  
**3-7pm**





## A Place for Communities

**Seminar Event:** Featuring Nicola Barclay, Homes for Scotland; Craig McLaren, Director RTP1 Scotland; Dairmuid Lawler, Architecture and Design Scotland

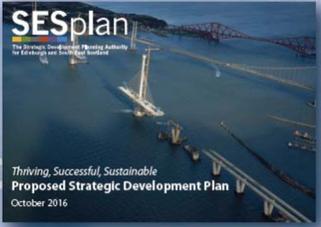
Friday 4<sup>th</sup> September 2015  
Chartered Institute for Housing, 125 Princes Street, Edinburgh  
9.30am to 1pm

Last few places available - email: [contactus@sesplan.gov.uk](mailto:contactus@sesplan.gov.uk)



# Appendix 3: Proposed Plan Leaflet

A guide to the publication of the Edinburgh and South East Scotland **Proposed Strategic Development Plan**



13 October to 24 November 2016



Page 350

**About SESplan**  
SESplan is the Strategic Development Planning Authority for the Edinburgh and South East Scotland city region. It is made up of six council areas: City of Edinburgh, East Lothian, Midlothian, West Lothian, the Scottish Borders and the southern half of Fife.



**SIX authorities make up the Edinburgh and South East Scotland Region**

**Strategic Development Plans**  
SESplan's role is to prepare a Strategic Development Plan every five years which sets out a vision for the long-term development of the region and deals with cross-boundary issues such as housing, green networks and transport.

As shown in the timeline (centre), the last Strategic Development Plan came into force in 2013 and needs to be replaced by 2018.

SESplan have now prepared a Proposed Strategic Development Plan, a key step in the process of replacing the current plan. The Proposed Strategic Development Plan is, in effect, a draft plan which represents SESplan's view on what we think the final content should be.

**2013** Strategic Development Plan 1 approved by Scottish Government

**2015** Main Issues Report published in advance of Strategic Development Plan 2

**2016** Proposed Strategic Development Plan 2 published

**2017** Proposed Strategic Development Plan 2 to be submitted to Scottish Government

**2018** Expected approval of Strategic Development Plan 2 by Scottish Government

**Local Development Plans**  
Local Development Plans, produced in the region's six council areas, must be consistent with the Strategic Development Plan. The current Local Development Plans in the region were prepared in line with the first Strategic Development Plan of 2013. The Proposed Strategic Development Plan, likely to come into force in 2018, will set the direction for Local Development Plans in the future.

**Publication and Consultation**  
Publication of the Proposed Strategic Development Plan is, in most cases, the final consultation stage where public comments can be made. It is therefore important that everyone has the opportunity to comment on the content of the Proposed Strategic Development Plan prior to the plan being submitted to the Scottish Government for consideration.

**More information on how you can comment can be found the back of this leaflet.**

**The inside pages of this leaflet give an overview of the issues covered by the plan.**

The Proposed Strategic Development Plan has been written after careful consideration of the responses to the Main Issues Report in 2015, other background evidence as set out in supporting documents and input from SESplan's six member local authorities.

**How to comment**  
As part of the publication of the Proposed Strategic Development Plan we are inviting comments, known as representations, on the content of the Proposed Plan.

You can make representations on the Proposed Plan from **Thursday 13 October to Thursday 24 November 2016 at 5pm**.

If you wish to submit a representation, this can be done using the on-line SESplan consultation portal:

**sesplan-consult.objective.co.uk**

In line with Scottish Government guidance, representations should be limited to no more than 2,000 words per issue - though you may submit representations on multiple issues.

**How to find out more**  
The Proposed Strategic Development Plan, supporting documents and further details on how to submit a representation can be viewed on our website:

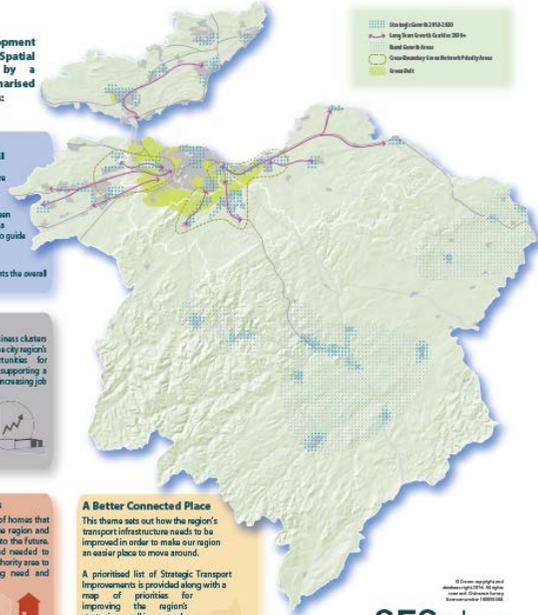
**www.sesplan.gov.uk**

Copies of the Proposed Strategic Development Plan are also available in public libraries and local planning authority offices in the region, and at the SESplan office:

**SESplan, Civic Centre, Howden South Road, Livingston, West Lothian EH54 6FF.**

You can contact us at **contactus@sesplan.gov.uk** or by calling **01506 282883**.

In addition you sign up to our mailing list via the website, follow us on Twitter @SESplan or like us on Facebook

**The Strategic Development Plan sets out a Spatial Strategy supported by a policy approach summarised under three key themes:**

**The Spatial Strategy**  
This sets out where most growth will happen over the next 12 years and provides a broad indication of where growth should be directed beyond 2030. It identifies the two Cross-Boundary Green Network Priority Areas and sets out a number of Placemaking Principles to guide Local Development Plans and planning decisions. The adjacent Key Diagram represents the overall Spatial Strategy.

**A Place to do Business**  
This theme identifies a series of business clusters identified for their contribution to the city region's economy. They provide opportunities for continued growth and expansion supporting a growing sustainable economy and increasing job opportunities. The theme also considers the low carbon economy, energy generation and how we manage the region's resources.

**A Place for Communities**  
This theme sets out how the region's transport infrastructure needs to be improved in order to make our region an easier place to move around. A prioritised list of Strategic Transport Improvements is provided along with a map of priorities for improving the region's strategic walking and cycling network.

**A Better Connected Place**  
This theme also sets out how well-planned green networks and thriving town centres can underpin successful places.

**Supporting Documents**  
Alongside the Proposed Strategic Development Plan a number of accompanying documents are also published. These include:  
**Action Programme:** This lists the specific actions needed to be delivered the intended outcomes of the plan  
**The Environmental Report:** A report of the Strategic Environmental Assessment of the plan  
**Record of Habitats Regulations Appraisal:** An appraisal of the impact of the plan on European protected areas  
**Housing Background Paper:** This sets out the evidence that underpins the approach to housing delivery in the plan  
**EqHRA:** A summary of an assessment to ensure equality and human rights considerations are embedded in the plan  
**Strategic Flood-risk Assessment:** This sets out how SESplan has considered existing and potential flooding issues  
**Green Network Technical Note:** This explains the approach to green networks and the strategic walking and cycling network  
**Transport Appraisal:** This identifies the impacts on the transport network  
 All documents can be viewed online at **www.sesplan.gov.uk**.



## SESplan Assets

### Distinctive Heritage and Culture

Home to over half of the top **20 most visited attractions in Scotland** and 1 in the UK top **10**



Festival City – Edinburgh hosts the largest annual cultural festival in the world. Generating over **£260 million** in the Scottish economy

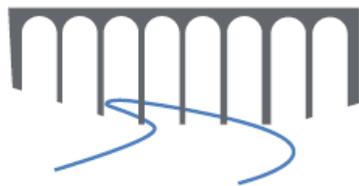
**2 UNESCO World Heritage Sites - Old and New Towns of Edinburgh**



and the **Forth Rail Bridge**

### A World Class Environment

**2 National Scenic Areas - Eildon & Leaderfoot and Upper Tweedale**



**Tweed Valley Forest Park -** including Glentress Mountain Biking Centre

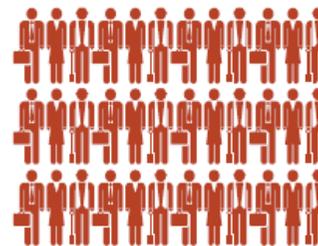
**Pentland Hills Regional Park -** Edinburgh's Playground & **Lomond Hills Regional Park -** Fife's Playground



**3 National Nature Reserves - Blawhorn Moss, Whitlaw Mosses & St Abb's Head**

### A Smart Economy

City Region contributes over **£33 billion** of Gross Added Value to Scotland's economy. **26%** of the country's output



Edinburgh is the **2nd most prosperous** city in the UK (2013)

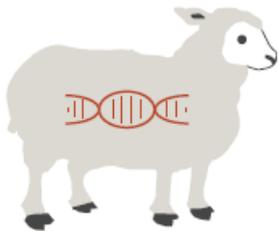


**31.7%** working age population educated to degree or equivalent level (Scotland 26.4%)  
Home to **4** major universities

### Scotland's Golf Coast Musselburgh to Dunbar



Over **20 Natura Sites** - Protected Areas of European Importance including most of the **Firth of Forth Coast and Islands**



The city is a **centre for excellence** for financial services and the region is one of the UK's **leading technology hubs**

### Advanced Engineering and Infrastructure



The Queensferry Crossing is the longest three-tower, cable-stayed bridge in the world and the **tallest bridge in UK**.



Borders Railway - **longest domestic railway** constructed in Britain for over **100** years



Edinburgh Airport Scotland's Busiest Airport with over **11 million** passengers

### A Region of Opportunities

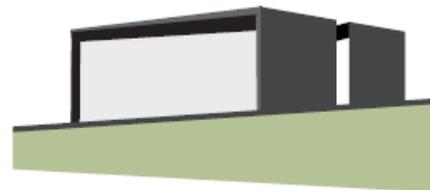


Rosyth Large freight handling capacity

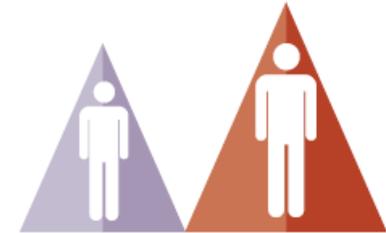


Generous Housing Land Supply

Diverse land for business in great locations



Serviceable ports to support offshore renewables



POPULATION of City Region set to rise by **18%** by 2038



**NOTICE OF PUBLICATION OF  
PROPOSED STRATEGIC DEVELOP-  
MENT PLAN  
THE TOWN AND COUNTRY PLAN-  
NING (DEVELOPMENT PLANNING)  
(SCOTLAND) REGULATIONS 2008  
& THE ENVIRONMENTAL ASSES-  
SMENT (SCOTLAND) ACT 2005**

SESplan, Strategic Development Planning Authority covering the local authority areas of City of Edinburgh, East Lothian, Fife (south), Midlothian, the Scottish Borders and West Lothian, has prepared a Proposed Strategic Development Plan (SDP). The Proposed SDP sets out a vision for long term development and deals with issues such as housing and infrastructure.

The Proposed SDP and the accompanying Environmental Report can be viewed online at [www.sesplan.gov.uk](http://www.sesplan.gov.uk), in public libraries and Local Authority planning offices in the region and at the SESplan office: SESplan, Civic Centre, Howden South Road, Livingston EH54 6FF.

Representations can be made during the Publication period from 10am 13 October to 5pm 24 November 2016. Representations can be submitted in writing to SESplan using the consultation portal on the SESplan website or to the address above. For further information email [contactus@sesplan.gov.uk](mailto:contactus@sesplan.gov.uk) or call 01506 282883.

**NOTICE OF PREPARATION OF MAIN  
ISSUES REPORT  
THE TOWN AND COUNTRY PLANNING  
(DEVELOPMENT PLANNING)  
(SCOTLAND) REGULATIONS 2008**

SESplan the Strategic Development Planning Authority for Edinburgh and South East Scotland (Edinburgh, East Lothian, Midlothian, Fife, Scottish Borders and West Lothian) has prepared a Main Issues Report (MIR) and will undertake a consultation between 21 July and 30 September 2015. The MIR can be viewed on the website: [www.sesplan.gov.uk](http://www.sesplan.gov.uk) and in public libraries, local planning authority offices and at the SESplan office: Civic Centre, Howden South Road, Livingston, EH54 6FF.

**THE ENVIRONMENTAL ASSESSMENT  
(SCOTLAND) ACT 2005**

SESplan has prepared an Interim Environmental Report for the MIR. It is available to view at [www.sesplan.gov.uk](http://www.sesplan.gov.uk) and planning authority offices.

Responses to both documents can be made through the SESplan Consultation Portal or in writing to the address above. All responses must be made by 5.00pm on 30 September 2015.

Further information is available on the SESplan website or contacting 01506 282883.

# Appendix 6a: Main Issues Report Leaflet and Easy Read Guide

## SESplan

The Strategic Development Planning Authority for Edinburgh and South East Scotland

SIX authorities make up the Edinburgh and South East Scotland Region

## SESplan Region in Numbers

**POPULATION** of City Region set to rise by **18%** by 2037

**HOUSEHOLD GROWTH** by 2037 predicted average household size 2.38 people

**25%** of the City Region's population aged 65+

**23.8%** of the Scottish Population live in the City Region

Over 42,000 registered businesses in the City Region

24,900 additional jobs projected by 2030

54% of the city's workforce educated to degree level

City of Edinburgh has 51% of all employment in the region

40.3% of electricity is generated by renewable or low carbon sources

44% recycling rate

13 local Nature Reserves, 10 Country Parks, 11 Special Areas of Conservation, 2 National Scenic Areas, 2 National Nature Reserves, 1 National Nature Reserve

more than 50% of the City Region is rural

11 of the top 20 most visited attractions in Scotland are in the City Region

Page 354

### Jobs, homes and investment where, why and how?

Over the next 20 years the Edinburgh and South East Scotland Region faces some important challenges -

- population and household growth,
- environmental concerns
- and infrastructure constraints.

The SESplan Main Issues Report is a document which explores some of these challenges.

### What is SESplan?

SESplan is the Strategic Development Planning Authority for the Edinburgh and South East Scotland region.

SIX authorities make up the Edinburgh and South East Scotland Region

SESplan prepare a Strategic Development Plan for the South East Scotland City Region. This is a planning document which covers the next 20 years and beyond. It is used to inform each Council's Local Development Plan. The Main Issues Report is the first stage in preparing a new Plan. The responses to the Main Issues Report will form the basis for preparation of the next Strategic Development Plan.

*We encourage everyone interested in shaping the future of the region to take the opportunity to tell us what you think.*

### The Issues

The SESplan Main Issues Report is a consultation document. It presents a series of issues and options about current and future planning challenges in the Edinburgh and South East Scotland Region and suggests how to address them. 15 issues along with key questions are set out under the following themes:

#### Spatial Strategy:

Where can growth be accommodated in the region? Should most new housing development be focussed around the city or should it be spread across the region?

**Concentrated Growth**      **Distributed Growth**

#### A Place to do Business:

How can employment and business growth be supported?  
How can the economies of all parts of the region – the city, the towns, and rural area be supported?

#### A Place for Living:

Is it reasonable to re-use brownfield sites in other towns to link up sites in Edinburgh?  
What areas should be prioritised for investment?

#### A Better Connected Place:

How can we ensure development is located to encourage sustainable travel?  
With restricted funding, what infrastructure projects should we prioritise?

#### Delivery:

How do we fund new development?  
Should member authorities work together on strategic infrastructure?

### What does SESplan mean for each area?

- Edinburgh:** How many houses should we plan to build and where can they go? What does development mean for the Green Belt? How can we support investment, business and tourism? How do we ensure new development is supported by sustainable transport modes?
- Fife:** Should Fife accommodate any housing demand from Edinburgh that cannot be met within the city? Should most new development be focussed in the Dunfermline area or spread further? How can we support business and growth sectors? What are the key transport priorities?
- West Lothian:** Should West Lothian accommodate some of the housing demand for Edinburgh, given the close transport connections to the city? How can we continue to support business and employment opportunities in the area? What infrastructure is required to deliver the plan?
- East Lothian:** Should East Lothian take additional houses to accommodate demand that arises from the city? How can we support growth and investment in East Lothian? Are the transport priorities right?
- Midlothian:** Should the Borders rail links justify further housing development? How can we ensure the vitality of town centres in Midlothian? What does mean for the Green Belt in Midlothian?
- Scottish Borders:** Should we build more housing in the Borders to support growth? How can we best support new employment opportunities arising from the Borders Rail Link? How can we support the economy of towns and rural areas?

**Further information:**  
The Main Issues Report Consultation runs from **21 July to 30 September 2015**.  
During this time we will be running drop-in events in the six council areas of the region. For details, and to download the SESplan Main Issues Report in full, please visit:

[www.sesplan.gov.uk](http://www.sesplan.gov.uk)

Here you can also register on our consultation portal to submit your responses. Alternatively, you can contact us via the details below:

**Address:** SESplan, Civic Centre, Howden South Road, Livingston, EH54 6FF  
**Email:** [contactus@sesplan.gov.uk](mailto:contactus@sesplan.gov.uk)      **Call:** 01506 282883

Follow us on Facebook and Twitter @sesplan

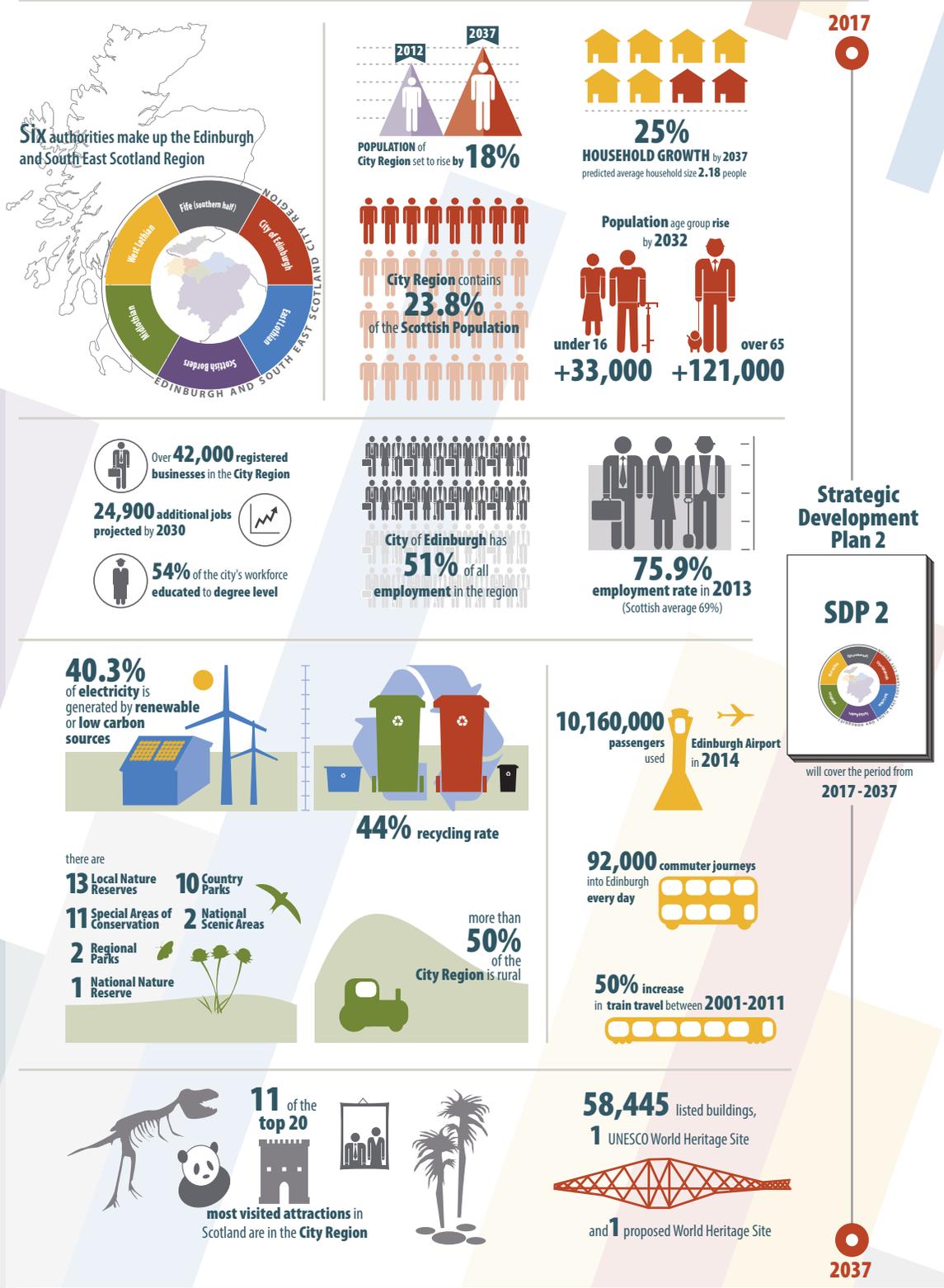
Copies of the SESplan Main Issues Report and an Easy Read Guide are also available to view in local libraries and member authority's planning offices.





# SESplan

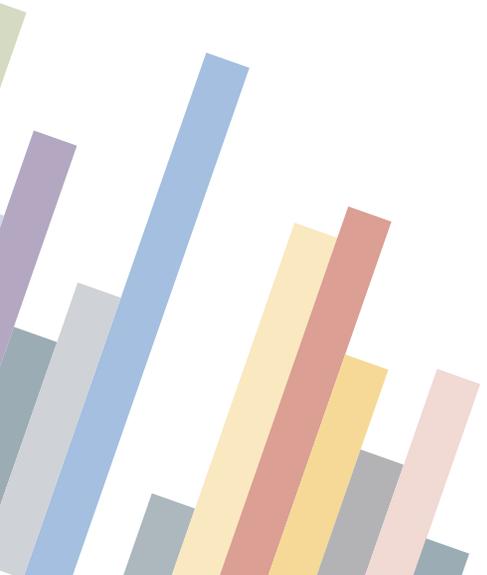
The Strategic Development Planning Authority  
for Edinburgh and South East Scotland



## SESplan Main Issues Report Easy Read Guide

# SESplan Main Issues Report

## **Easy Read Guide**



# Contents

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<b>About SESplan</b>	<b>2</b>
The Main Issues Report	2
Further information	2
<b>The Main Issues Overview</b>	<b>3</b>
<b>The SESplan Vision</b>	<b>4</b>
<b>The Spatial Strategy</b>	<b>5</b>
<b>A Place to do Business</b>	<b>7</b>
Visitor Economy	7
Wind	8
Minerals	8
<b>A Place for Communities</b>	<b>9</b>
Housing in Edinburgh	10
Affordable Housing	11
Town Centres	11
Green Networks	12
<b>A Better Connected Place</b>	<b>13</b>
Funding Transport	13
Transport Priorities	14
<b>Next Steps</b>	<b>15</b>
<b>More Information</b>	<b>16</b>
<b>Contact Us</b>	<b>16</b>

## About SESplan

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SESplan is the Strategic Development Planning Authority for Edinburgh and South East Scotland. Our role is to prepare a Strategic Development Plan dealing with cross boundary planning issues such as housing, economic growth, green networks and infrastructure and provide a long term vision for the region.

SESplan is made up of six council areas. These are City of Edinburgh, East Lothian, Midlothian, West Lothian, the Scottish Borders and Fife (southern half). SESplan works in partnership with these member authorities.

The Strategic Development Plan is used to inform Local Development Plans produced by the member authorities. Local Development Plans are currently being prepared by all member authorities and these are responding to the direction set in the first Strategic Development Plan which came in to force in 2013.

## The Main Issues Report

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We are at the first official stage of preparing the second Strategic Development Plan where we produce a Main Issues Report. The Main Issues Report is a consultation document which highlights the key challenges facing the region over the next 20 years and presents a series of issues and options on how to address them.

It is important that we engage as many people as we can during the Main Issues Report consultation and receive responses on the issues as these responses will help inform the policies in the second Strategic Development Plan.

The Main Issues Report consultation takes place from **21 July 2015 until 30 September 2015**. You can give your responses on the issues during the consultation period by submitting a response via the SESplan [Consultation Portal](#).

## Further information

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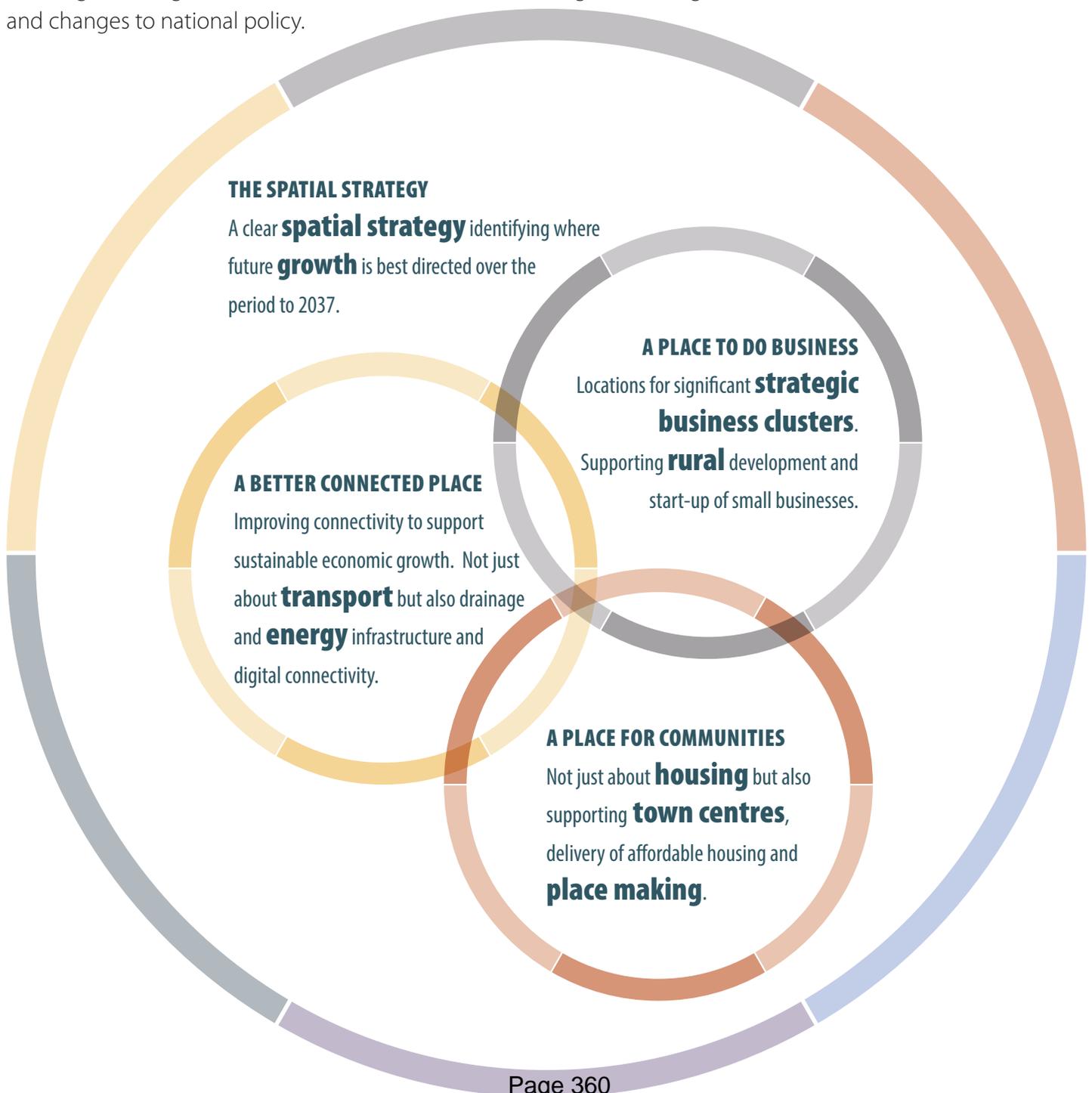
This is a summary document intended to give an overview of the key issues and questions raised in the Main Issues Report. If you would like further information the full version of the can be found [here](#) on our website. Copies can also be viewed in local libraries and at the planning offices of the member authorities. The Main Issues Report is supported by more detailed Technical Notes and background documents which are also available on the SESplan [website](#).

Consultation events will be running across the region and a full list can be found on the SESplan [website](#).

# The Main Issues Overview

The full version of the Main Issues Report is split into chapters each looking at a different themes. The themes include the *Spatial Strategy*, *a Place to do Business*, *a Place for Communities* and *a Better Connected Place*. Several issues are considered under under each theme. The key issues considered are the 20 year vision for the region, the strategy for growth, locations of Significant Business Clusters, the Visitor Economy, Housing, Green Networks and Transport.

The themes raised within the Main Issues Report explore changes from the previous Strategic Development Plan. The themes highlight the challenges the region faces and are derived from monitoring, forecasting and changes to national policy.



# The SESplan Vision

It is important Strategic Development Plans set a vision for how we hope the region will change for the better over a 20 year period. The aims of the policies in the Strategic Development Plan are to make this vision happen. We are updating our vision from the first Strategic Development Plan to be more focussed on the place and define what success looks like.



Options	Question
<p>a The preferred option for the vision is set out above. It aims to build on the strengths of Edinburgh and South East Scotland, address its challenges and set a clear direction for its future growth.</p>	<p>Do you support the preferred option, the alternative option or none of the options?</p>
<p>b The alternative option is that we maintain the vision of SDP1 which was ‘By 2032 the Edinburgh City Region is a healthier, more prosperous and sustainable place which continues to be internationally recognised as an outstanding area in which to live, work and do business’.</p>	

# The Spatial Strategy

This chapter looks at how the plan can best support sustainable economic growth in the region. Three options are presented with each addressing growth in a different way.

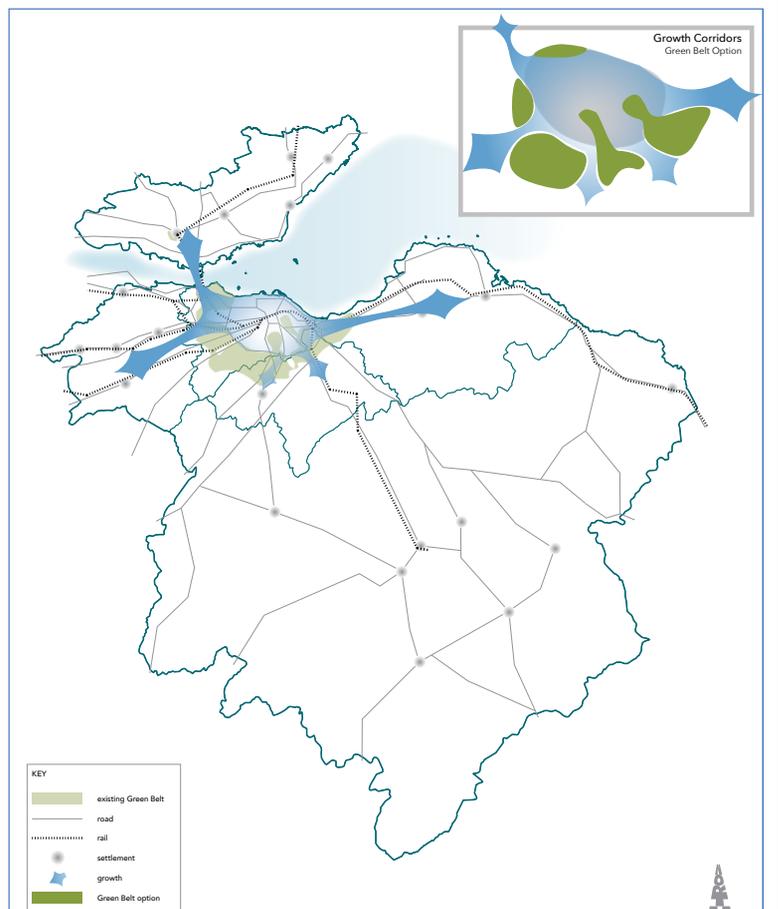
The spatial strategy of the first plan dispersed growth to thirteen Strategic Development Areas across the region. In particular, this approach dispersed a high proportion of Edinburgh’s demand for housing beyond the city and aimed to meet that demand in neighbouring local authorities.

As Edinburgh continues to experience a high need and demand for housing in the next plan, we think it would be appropriate to accommodate more of Edinburgh’s housing demand within the city. This will ensure more housing need and demand is met where it arises, helping to make best use of existing infrastructure, reduce the need to travel, contribute to addressing climate change and ensure economic growth is supported.

The preferred option is to change the Spatial Strategy to accommodate a higher proportion of development close to Edinburgh where there is greatest demand. The three options are set out below. Each of the options do not propose more or less growth than each other, just different ways it could be accommodated throughout the region:

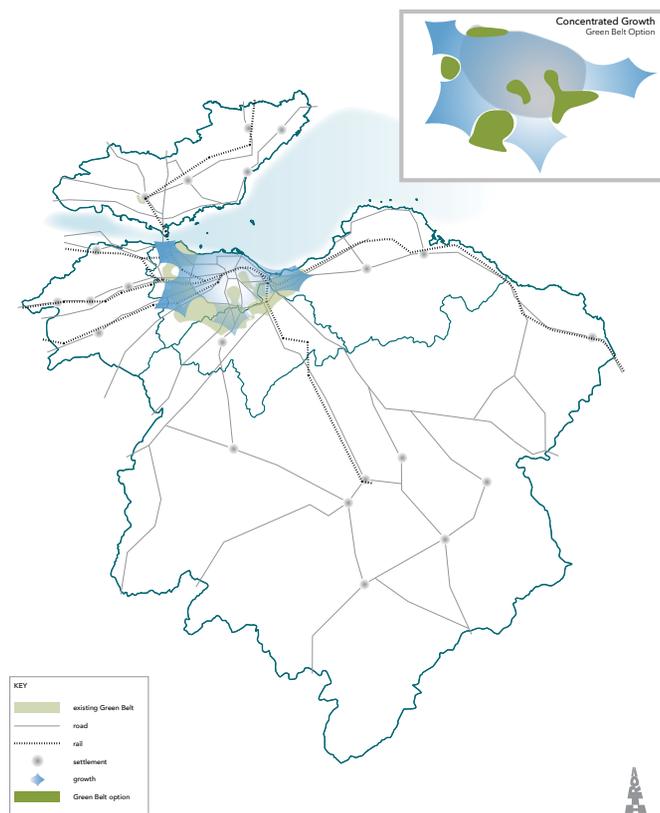
## Option 3 Growth Corridors - Preferred

This option would include more development in Edinburgh and a smaller level of dispersal to neighbouring authorities than the current plan. This would likely be in south east and west of the city. The remaining dispersed development would be in towns close to Edinburgh that are accessible by public transport. This option aims to balance green belt changes against demand for housing in the city.



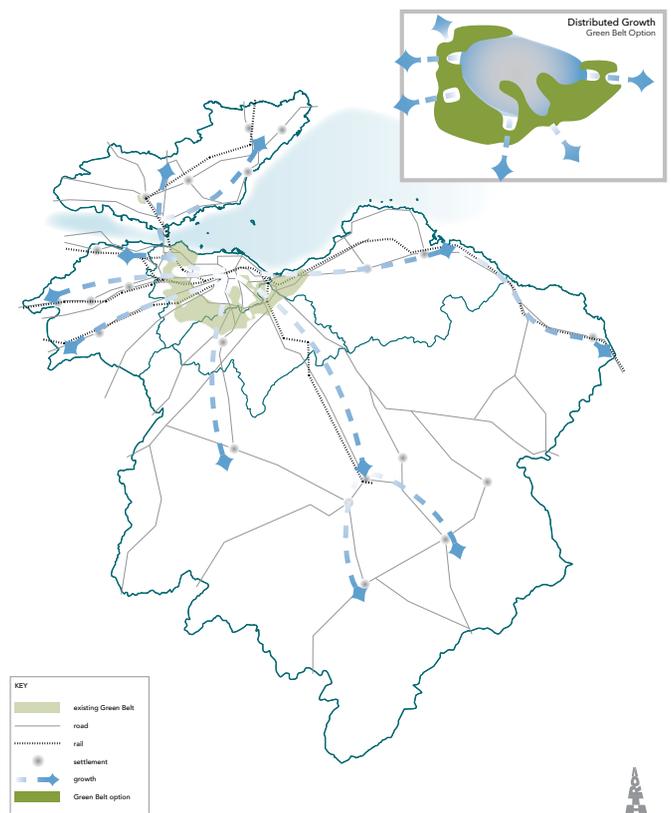
### Concentrated Growth - Alternative Option 1

This option would see Edinburgh accommodate the majority of its own demand. Only a small proportion of housing would be dispersed to neighbouring authorities. This would require the greatest modification to the Edinburgh Green Belt.



### Distributed Growth - Alternative Option 2

This option is similar to the strategy of the first Strategic Development Plan. This would mean growth spread further away from where demand is and potentially removed from public transport links. This strategy could result in a large increase in commuting back to Edinburgh for work.



#### Options

- a The preferred option is Option 3- Growth Corridors.
- b The alternative option is Option 1 – Concentrated Growth.
- c Option 3 – Distributed Growth.

#### Question

Do you support the preferred option, either of the alternative options or none of the options?

#### Further Reading:

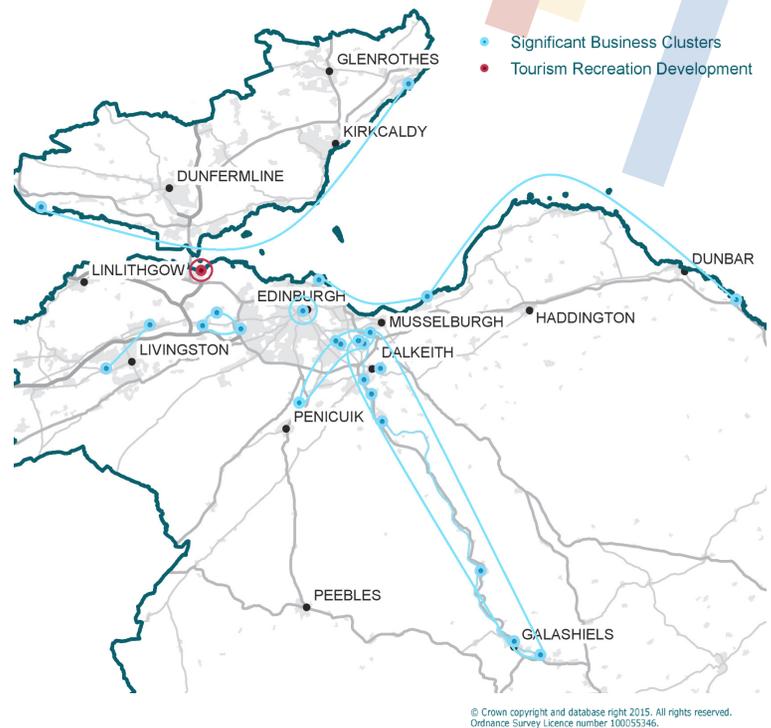
- Main Issues Report issue B

## A Place to do Business\_\_\_\_\_

This chapter deals with employment, tourism, minerals, waste and renewable energy.

The Main Issues Report proposes to maintain the approach of the first Strategic Development Plan on the supply and location of land for employment. This requires Local Development Plans to provide a range of marketable sites that meet the needs of business and industry including business parks and industrial estates.

Supporting business is important for a growing the economy and to create jobs for the people that live in the area. In the next Strategic Development Plan it is proposed to identify locations of significant business clusters. These are groupings of similar or complementary businesses with a particular impact on the region's economy. The aim of identifying these areas is to ensure they are supported by infrastructure and housing and to ensure they are able to grow.



### Options

- a The preferred option is to identify significant business clusters which reflect the different economies of the city, towns and rural areas in the region.
- b The alternative option is to limit the identification of business clusters to Enterprise Areas, National Renewable Infrastructure Plan sites and groups of industries identified as growth sectors by Scottish Enterprise.

### Question

Do you support the preferred option, the alternative option or none of the options?

## Visitor Economy\_\_\_\_\_

The region has a large tourism industry and it is a major contributor towards jobs and the region's economy. It is proposed to safeguard national and regionally important tourism developments to help grow tourism further.

### Option

- a The preferred option is for Local Development Plans to safeguard nationally and regionally important tourism and recreation development and emerging tourism opportunities.

### Question

Do you support the preferred option?

## Wind

---

Renewable energy generation such as wind can help the region meet the Scottish Government's targets of generating 100% gross electricity usage from renewable sources by 2020. There is potential for further onshore wind development in the region but many of the most suitable and least harmful sites have already been developed. The next Strategic Development Plan proposes to include a spatial framework diagram for onshore wind. This will set out broad areas where wind turbines may be acceptable subject to detailed Local Development Plan policies and taking into account other considerations such as landscape capacity.

### Question

Do you support the emerging content of Strategic Development Plan 2 relating to wind energy?

## Minerals

---

Minerals are essential to economic growth, providing materials for construction, manufacturing and the energy sector.

### Options

- a The preferred option is to continue the approach of the first plan and identify areas of search for aggregate minerals and surface coal mining areas or where appropriate specific sites. There will be no spatial guidance on the location of onshore oil and gas installations.
- b The alternative option to identify broad areas of search for aggregate minerals and surface coal mining across of the region based on environmental factors. Areas will be further defined by Local Development Plans.

### Question

Do you support the preferred option, the alternative option or none of the options?

### Further Reading:

- Main Issues Report issues C, D and E
- Minerals Technical Note
- Economy Technical Note
- Waste Technical Note

# A Place for Communities

This chapter looks at the predicted number of houses required over the 20 year plan period, and where the need and demand for houses occurs. It also considers affordable housing needs, town centres and green networks.

The region is expected to be one of the fastest growing areas in Scotland in terms of population and household growth. In order to accommodate this growth we will need more housing. Three economic scenarios are considered as the basis for estimating the number of new houses which will be required over the next twenty years. The scenarios are:

- 1 Steady Economic Growth (based on steady economic upturn) – the Preferred option;
- 2 Increasing Economic Activity (based on more high and low skilled jobs); and
- 3 Strong Economic Growth (based on the region becoming one of the fastest growing in the uk).

Plan Period	Option 1 (steady) - Preferred		Option 2 (increasing)		Option 3 (strong)	
	number of houses					
	Total	Annual	Total	Annual	Total	Annual
2012-2029	102,800	5,700	120,300	6,700	138,000	7,700
2030-2037	31,800	4,000	43,800	5,500	56,300	7,000

## Options

The option we prefer is to base the housing numbers on economic growth continuing at a steady pace. This provides the housing figures for Option 1. Options 2 and 3 set higher figures but these are considered unrealistic for a number of reasons, including issues with delivery.

## Question

As the basis for deriving the housing supply targets and housing land requirements within Strategic Development Plan 2, do you support the preferred option, either of the alternative options or none of the options?

## Housing in Edinburgh

As indicated in the Spatial Strategy, a high proportion of housing need and demand comes from Edinburgh. This is one of the key issues for SESplan. Under the existing Strategic Development Plan Edinburgh is expected to meet a lower proportion of its own need with housing distributed elsewhere within the region. For the next Strategic Development Plan the proportion of housing need and demand met in Edinburgh is being reconsidered.

Three options put forward are:

- 1 Edinburgh meets all of its own need;
- 2 Edinburgh meets an increased proportion of its own need compared to the existing Strategic Development Plan - the Preferred option; and
- 3 Edinburgh meets the same proportion of its own need, as under the existing Strategic Development Plan.

Plan Period	Option 1 (all)		Option 2 (increased) - Preferred		Option 3 (same)	
	number of houses					
	Total	Annual	Total	Annual	Total	Annual
2012-2029	59,700	3,300	41,800	2,300	36,400	2000
2030-2037	21,800	2,700	15,300	1,900	13,100	1,600

We consider that Edinburgh should meet an increased proportion of its own need and demand. This would allow housing to be built closer to where the need and demand arise without placing significant additional pressure on existing infrastructure in the city. If Edinburgh was to continue to meet the same, lower proportion, this is likely to encourage less sustainable travel.

In the second Strategic Development Plan the spatial strategy, the amount of housing proposed and the proportion accommodated in Edinburgh will all be clearly linked. At the Main Issues Report stage we are seeking your views on these as individual issues. This is to allow you the greatest chance to shape and influence the whole plan.

### Options

- a The preferred option is option 2 - Edinburgh meets an increased proportion of its own housing need.
- b An alternative is option 1 - Edinburgh meets all of its own housing need.
- c Another alternative is option 3 - Edinburgh meets a lower proportion of its own housing need.

### Question

Do you support the preferred option, either of the alternative options or none of the options?

## Affordable Housing

The provision of affordable housing is a major issue for the city region. There remains a substantial difference between the need and demand for affordable housing and the rate at which it is being built. It is expected that over half of the total need for housing to the end of the plan will be for affordable housing. Over the past five years the number of affordable houses completed as a share of all houses built has been significantly lower than requirements.

### Options

- a The preferred option is to direct Local Development Plans to require a 25% minimum of the total number of houses provided on a site to be affordable but allow plans to vary this where justified by local needs.
- b The alternative option is for Local Development Plans to seek minimum levels of affordable housing above 25% to meet identified need with no flexibility for local circumstances.

### Question

Do you support the preferred option, the alternative option or none of the options?

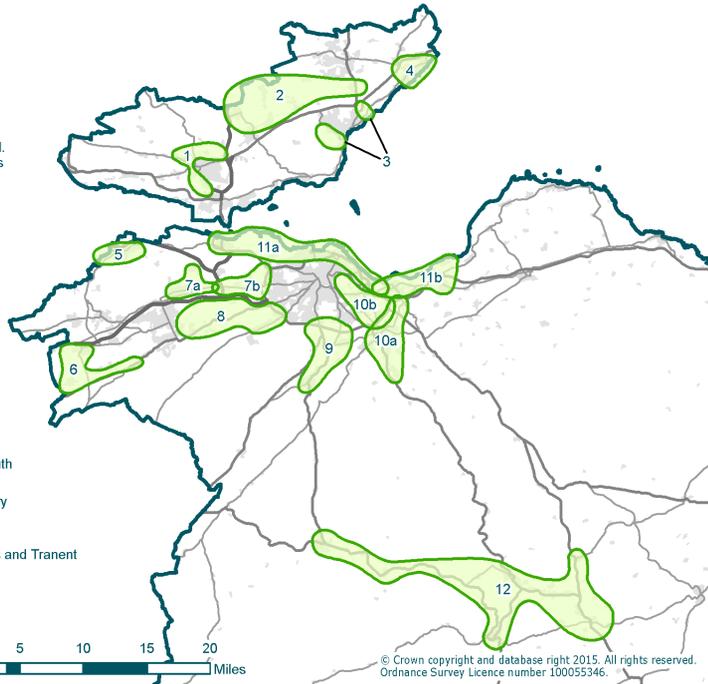
## Town Centres

It is proposed to retain a town centre first policy, whereby retail and certain commercial uses are directed to town centres. It is proposed to extend this to include a wider range of uses. Other uses which will be encouraged in town centres including office, leisure and housing in order to create vibrant town centres.

### Further Reading:

- [Housing Need and Demand Assessment 2](#)
- [Housing Land Technical Note](#)
- [Spatial Strategy Technical Note](#)
- [Main Issues Report issues F, G, H and I](#)

- 1- Dumfermline Development Area
- 2- Ore Valley Area & settlement
- 3- Kircaldy Development Areas
- 4- Levenmouth - river & coast
- 5- Linlithgow area, inc. Union Canal, Rivert Avon and links to Whitecross
- 6- Whitburn to Fauldhouse and the settlements east along the Breich Valley
- 7a- Broxburn area inc. Uphall, Winchburgh and A8 corridor west
- 7b- West Edinburgh to Newbridge including A8 corridor west
- 8- East Calder area, incl. A71 corridor east to Edinburgh
- 9- Penicuik to Fairmilehead, incl. Bilston, Straiton, Hillhead, Burdiehouse and Pentland Hills fringe.
- 10a- Gorebridge to Dalkeith, inc. A7/Borders Development Area
- 10b- Holyrood to Dalkeith, inc. South East Edinburgh SDA
- 11a- Forth Coast- South Queenferry to Musselburgh
- 11b- Forth Coast- Musselburgh to Port Seton and inland to Blindwells and Tranent
- 12- Central Borders



## Green Networks

A range of green spaces, natural landscapes, woodlands, coastline, waterways and outdoor recreation contribute towards the success of the region. They add to the area's character and enhance people's quality of life and sense of place. They support healthy lifestyles, provide for recreation and help biodiversity to flourish. It is essential we protect and enhance this network of green spaces.

### Options

- a The preferred option is to identify priority areas for green networks in the Strategic Development Plan.
- b The alternative option is to support a strategic green network but with the identification, prioritisation and development undertaken by Local Development Plans.

### Question

Do you support the preferred option, the alternative option or none of the options?

### Further Reading:

- Main Issues Report issue J
- Spatial Strategy Technical Note
- Green Network Technical Note

## A Better Connected Place\_\_\_\_\_

This chapter looks at how we can encourage more people to walk, cycle or use public transport and ensure that development supports improved public transport and infrastructure.

The main policy on transport in the first Strategic Development Plan encourages Local Development Plans to guide development to areas which are currently accessible through walking, cycling and public transport or to areas which can be made accessible by these modes of travel. The preferred option in the next plan is for greater emphasis to be placed on locating development near public transport and that development is planned to encourage walking and cycling. It is also proposed to promote higher densities of housing close to public transport networks and include a regional walking and cycling network in the plan.

### Option

- a The preferred option is to amend parts of Policy 8 in the first plan to better direct development areas that support walking, cycling and public transport.
- b The alternative option is to retain Policy 8 of the first plan without modification.

### Question

Do you support the preferred option, the alternative option or none of the options?

## Funding Transport Infrastructure\_\_\_\_\_

Funding for new transport infrastructure such as new stations and roads is a major issue. It is considered that when transport improvements benefit more than one local authority, it would be advantageous to fund improvements in partnership.

### Option

- a The preferred option for member authorities is to work towards developing sub-regional development contribution framework. This could pool contributions from a number of authorities to support strategic infrastructure with benefits to the wider area.
- b The alternative option is to maintain the current position and seek developer contributions on a case by case basis.

### Question

Do you support the preferred option, the alternative option or none of the options?

## Transport Priorities

There are many instances where improvements are required to existing transport infrastructure to bring forward new development or to reduce existing issues such as traffic congestion. The preferred option in the Main Issues Report is to prioritise strategic transport requirements in partnership with other organisations to help bring forward this infrastructure. A transport appraisal will be prepared to inform the next plan which will provide details of the strategic transport priorities. An initial list of priorities is shown below:

Intervention	Purpose
A720 Improvements	Minimise additional delay.
East Linton Rail Station, Reston Rail Station and East Lothian Link Improvements	Improve access and capacity to support future development.
Edinburgh Orbital Bus Routes	Promote sustainable travel
Edinburgh Tram Extensions	Promote sustainable travel
Edinburgh Waverley Improvements	Increase capacity
Fully Duelled A1 Edinburgh – Newcastle	Increase access, safety and economic growth
Levenmouth Rail Link	Support planned development and access to jobs
Strategic Walking and Cycling Network	Support sustainable travel
Winchburgh Rail Station and M9 Junction	Required by planned and future development

### Options

- a The preferred option is for SDP2 to prioritise infrastructure to ensure delivery of key projects to maximise economic potential, enable planned development and increase accessibility by sustainable transport networks.
- b The alternative option is to identify a long list of strategic transport infrastructure priorities without prioritisation.

### Question

Do you support the preferred option, the alternative option or none of the options?

### Further Reading:

- Main Issues Report issues K and L

- Spatial Strategy Technical Note

Thank you for reading through the SESplan Main Issues Report summary.

If you want further information on the issues raised you can read the Main Issues Report in full and reference the supporting documents via the further reading links.

You can respond to the questions raised here via the **SESplan Consultation Portal** available on our webpage.

All responses must be complete by 30 September 2015.

## Next Steps

Following the close of consultation on the 30 September, we will use the responses to help us prepare the second Strategic Development Plan. The expected timetable for preparing the next plan is set below:

<b>SUMMER 2015</b>	<ul style="list-style-type: none"> <li>• Publication of Main Issues Report</li> <li>• Consultation of Main Issues Report</li> </ul>
<b>AUTUMN 2015</b>	<ul style="list-style-type: none"> <li>• Analysis of Main Issues Report 2 Consultation Responses</li> </ul>
<b>SPRING / SUMMER 2016</b>	<ul style="list-style-type: none"> <li>• Publication of Proposed Plan and Supporting Documents</li> <li>• Period for Representations</li> </ul>
<b>SUMMER / AUTUMN 2016</b>	<ul style="list-style-type: none"> <li>• Analysis of Representations</li> </ul>
<b>SPRING 2017</b>	<ul style="list-style-type: none"> <li>• Submission of Proposed Plan, Supporting Documents and Representations Received to Scottish Ministers</li> </ul>
<b>AUTUMN / WINTER 2017</b>	<ul style="list-style-type: none"> <li>• Examination of Proposed Plan</li> </ul>
<b>SPRING / SUMMER 2018</b>	<ul style="list-style-type: none"> <li>• Approval of Strategic Development Plan 2</li> </ul>

## More Information

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If you would like more information and details on the subjects discussed here, please refer to the following documents:

**The Main Issues Report;**

**The Interim Environmental Report;**

**The Monitoring Statement;**

**The Equalities and Human Rights Impact Assessment;**

**The Spatial Strategy Technical Note;**

**The Economy Technical Note;**

**The Housing Land Technical Note;**

**The Green Network Technical Note;**

**The Minerals Technical Note; and**

**The Waste Technical Note.**

All documents are available on the website  
[www.sesplan.gov.uk](http://www.sesplan.gov.uk)

## Contact Us

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# SESplan

The Strategic Development Planning Authority  
for Edinburgh and South East Scotland



HAPPY TO TRANSLATE

সহজ ভাষায় অনুবাদ করুন  
MOZEMY PRZETŁUMACZYĆ 很容易翻譯

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**ITEM 7 – DEVELOPMENT PLAN SCHEME 9**

Report by: Alice Miles, Acting SDP Manager

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**Purpose**

This Report presents Development Plan Scheme number 9 (DPS 9) for approval. Publishing a DPS at least annually is a statutory duty. The DPS must include a Participation Statement setting out how, when and with whom SESplan will consult on the various Strategic Development Plan (SDP) stages. DPS 8 was approved by SESplan Joint Committee on 21 March 2016. The proposed DPS 9 is attached as Appendix 1 to this Report.

**Recommendations**

It is recommended that the SESplan Joint Committee:

- a) approves the proposed Development Plan Scheme (DPS 9) including the timeline and Participation Statement for SDP2 submission to Scottish Ministers as set out within Appendix 1 to this report;
- b) notes that the Development Plan Scheme has to be reviewed and published at least annually; and
- c) authorises the SDP Manager to make any necessary minor editing and design changes to DPS 9 prior to publication.

**Financial Implications**

Any costs related to publishing the DPS are allowed for and will be met from within the Operating Budget 2016 / 2017 as approved in principle by the Joint Committee on the 28 November 2016 and to be considered under Item 9.

**Legal & Risk Implications**

All risks are detailed in the SESplan Risk Register and reported to Joint Committee on an annual basis.

No separate impact assessment is required.

### **1. Background**

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- 1.1 Section 20B of the Planning etc. (Scotland) Act 2006 ('the Act') requires a DPS to be prepared at least annually for the SDP. Its purpose is to set out the Strategic Development Planning Authority's (SDPA) programme for preparing, reviewing and consulting on its SDP.
- 1.2 After adopting a DPS, the Act requires the authority to publish it (including electronically), send two copies to Scottish Ministers and place copies in public libraries. There is no requirement to consult on the content of DPS and no provision for Ministers to approve them.
- 1.3 Circular 6/2013 requires that the DPS includes a Participation Statement, which indicates when, how and with whom consultation on the SDP will take place. Circular 6/2013 also states that one of the measures of a Planning Authority's performance will be whether the programme to replace the plan, as set out in the DPS, is on track.
- 1.4 Best practice in consultation and engagement is set out in Planning Advice Note (PAN) 3/10 Community Engagement. The aim is to make plan-making more open, inclusive and accessible. A DPS also sets out the authority's proposals for public involvement in plan making.
- 1.5 The proposed DPS9 includes the timetable for submission of SDP and Supplementary Guidance. It also contains SESplan's Participation Statement.

### **2. Proposed Plan and Progress against DPS8**

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- 2.1 DPS 8 set out a timeline with the submission of the Proposed Plan to the Scottish Government in June 2017 inline with the statutory timescales requiring plan submission within 4 years of SDP approval. It also indicated that the Proposed Plan Publication would take place in summer 2016. Whilst the Proposed Plan was published in October 2016, just past the indicated timeframe, SESplan have remained on track to the statutory timescale for submission.

2.2 As noted above, DPS 9 contains a Participation Statement continuing on from the aims set out in DPS 8. SESplan have confirmed conformity with the Participation Statement during the preparation of the Proposed Plan exceeding statutory requirements. The Statement of Conformity with the Participation Statement is included under Item 6. The updated Engagement and Participation section in DPS 9 also sets out how SESplan will continue to update stakeholders with news and progress in relation to the Proposed Plan.

### **3. Publication and Circulation**

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3.1 Following approval of DPS 9 by Joint Committee, it will be made available on the SESplan website. Copies will be printed and circulated to all libraries in the SESplan area. The DPS will also be available at the SESplan offices and at the planning receptions of the Member Authorities. Two copies will also be submitted to Scottish Ministers as required.

3.2 Information on the publication of DPS 9 will be noted on the [SESplan website](#) and via the [SESplan Twitter](#) account.

### **Appendices**

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Appendix 1                      Development Plan Scheme 9

**Report Contact:** Lynne McMenemy, SESplan Planner, [lynne.mcmenemy@sesplan.gov.uk](mailto:lynne.mcmenemy@sesplan.gov.uk), 01506 282882

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**Report Agreed by:** Alice Miles, Acting SDP Manager



# SESplan

The Strategic Development Planning Authority  
for Edinburgh and South East Scotland

## Development Plan Scheme 9 March 2017



## Contents

<b>1 BACKGROUND</b>	<b>2</b>
<b>2 RECENT PROGRESS AND FUTURE MILESTONES</b>	<b>5</b>
<b>3 ENGAGEMENT AND PARTICIPATION</b>	<b>7</b>
<b>4 HOW TO GET INVOLVED</b>	<b>11</b>

# 1 Background

## Background

The South East Scotland Strategic Development Planning Authority was established in 2008 following the reform of the planning system in Scotland through the Planning etc. Scotland Act, 2006. The South East Scotland Strategic Development Planning Authority, SESplan, is a partnership of six Local Authorities ('member authorities') including East Lothian Council, City of Edinburgh Council, Fife Council, Midlothian Council, Scottish Borders Council and West Lothian Council. SESplan works collaboratively with Key Agencies and stakeholders to produce a deliverable and effective Strategic Development Plan for Edinburgh and South East Scotland. The area covered by SESplan is illustrated in Figure 1.1.

SESplan is governed by a Joint Committee which comprises of 12 Councillors, two from each of the six member authorities. The Joint Committee, which meets at least twice a year, has as its main purpose the preparation, monitoring and review of the Strategic Development Plan.

## Development Plans

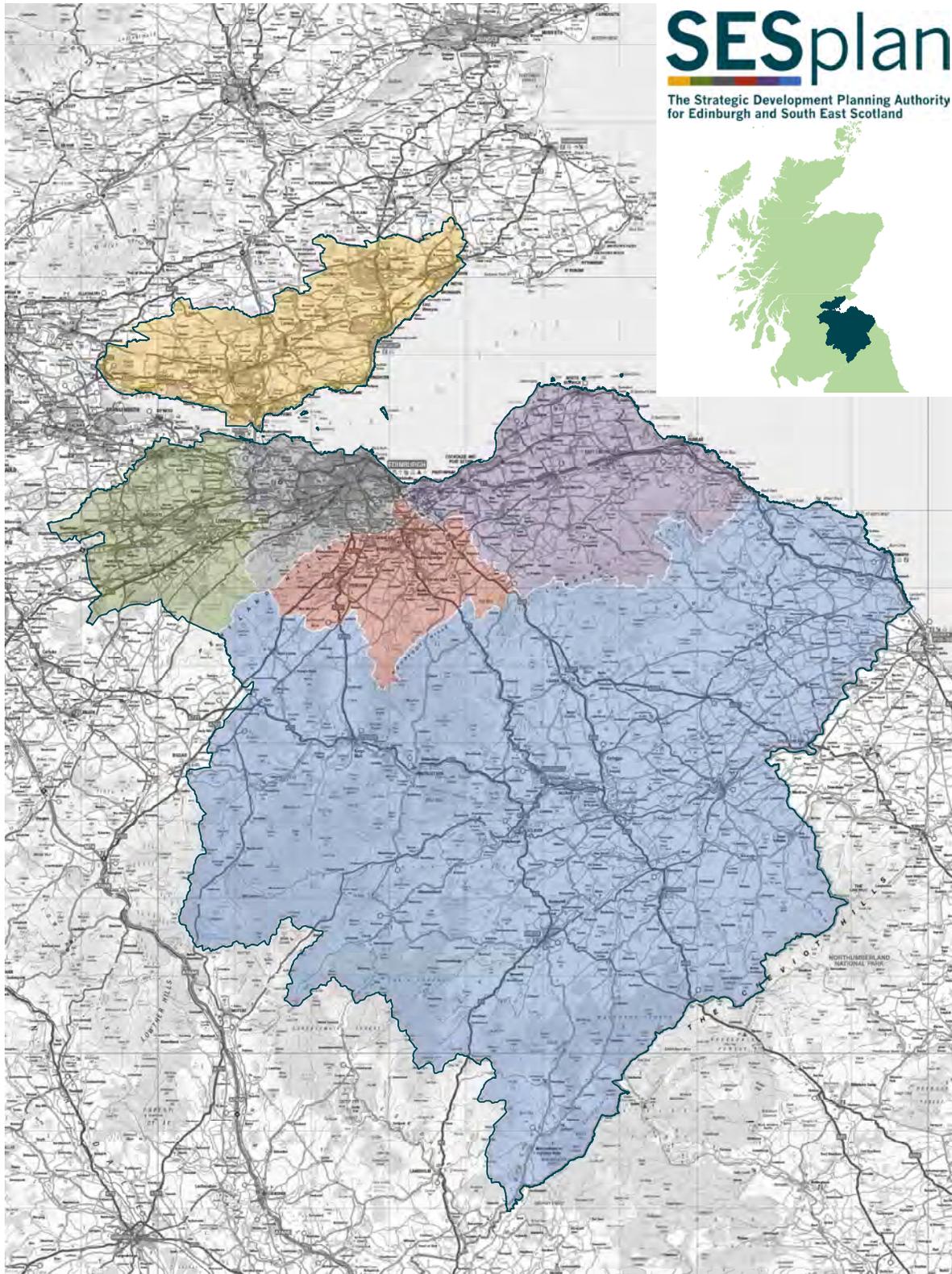
The planning system impacts on us all, either directly or indirectly. It is essential that everyone has an opportunity to get involved with the Development Plan in their area. In the SESplan area the Development Plan consists of the Strategic Development Plan covering the whole SESplan area and the Local Development Plans covering the individual member authority areas. Preparation of the Strategic Development Plan and the Local Development Plans is a statutory requirement.

The Strategic Development Plan helps to identify areas of change and priorities for infrastructure and sets out a spatial strategy for the region which informs the Local Development Plans. Local Development Plans must be consistent with the Strategic Development Plan and therefore involvement in the Strategic Development Plan is important for shaping the future of the region.

Decisions on where and how development will take place in the SESplan area are currently influenced by the following key documents:

1. The National Planning Framework for Scotland and Scottish Planning Policy - published June 2014;
2. The [Strategic Development Plan](#) - approved 27 June 2013;
3. [Housing Land Supplementary Guidance](#) - adopted 28 October 2014; and
4. Local Development Plans - approved or under preparation.

Figure 1.1 SESplan Area



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# 1 Background

## The Development Plan Scheme

The Development Plan Scheme sets out our current programme for preparing and reviewing the Strategic Development Plan. The scheme includes:

- A proposed timetable for preparing the second Strategic Development Plan and Supplementary Guidance;
- A summary of what's involved at the various stages in preparing the plan;
- A participation statement with information on when and how you can get involved and how we will keep you updated; and
- Details on how you can make responses or representations at relevant stages.

The Development Plan Scheme also sets out how you can access documents both electronically and in hard copy. The Development Plan Scheme is updated every year to keep everyone informed about the Strategic Development Plan's progress. If there are significant changes to the Strategic Development Plan timetable or engagement plans in the interim then SESplan may publish an update of the Development Plan Scheme.

**Figure 1.2 Document Timeline**



## Recent Progress and Future Milestones 2

### Current Strategic Development Plan

The first Strategic Development Plan was approved, with modifications, by Scottish Ministers on 27 June 2013 following a thorough Examination process. Following approval of the Strategic Development Plan, the SESplan Joint Committee adopted an updated Action Programme. The Approved Plan, Action Programme and Environmental Report are available to view on the [SESplan website](#), at the SESplan office and in public libraries within the SESplan area.

In approving the Strategic Development Plan, Scottish Ministers made modifications to Policy 5 (Housing Land) requiring Supplementary Guidance to be prepared to provide further detailed information for Local Development Plans. The Supplementary Guidance provides information on how much of the overall housing land requirement should be met in each of the six member authority areas in the periods 2009-2019 and 2019-2024. The Supplementary Guidance was formally adopted by all Member Authorities on 28 October 2014.

### Recent Progress and Future Milestones

Following on from the Main Issues Report, 2015 SESplan published the Proposed Strategic Development Plan (the 'Proposed Plan') on 13 October 2016. During a six week Proposed Plan consultation period SESplan received over 800 representations from 168 respondents. SESplan have been reviewing the representations and preparing responses to them prior to submission of the Proposed Plan to the Scottish Government. SESplan intend to submit the Proposed Plan to the Scottish Government in June this year. The Proposed Plan's examination is expected to take around 9 months.

Once the Proposed Plan has been examined and approved it will then become the current Strategic Development Plan (SDP2) superseding the current Strategic Development Plan which came into force in 2013. This is expected to take place mid-2018.

Measured against previous DPS, SESplan's recent progress is in line with expected timescales and is on track for meeting the four year statutory timescale for SDP submission.

A timescale of the key stages for the Strategic Development Plan is illustrated in Figure 2.1 Strategic Development Plan Timeline.

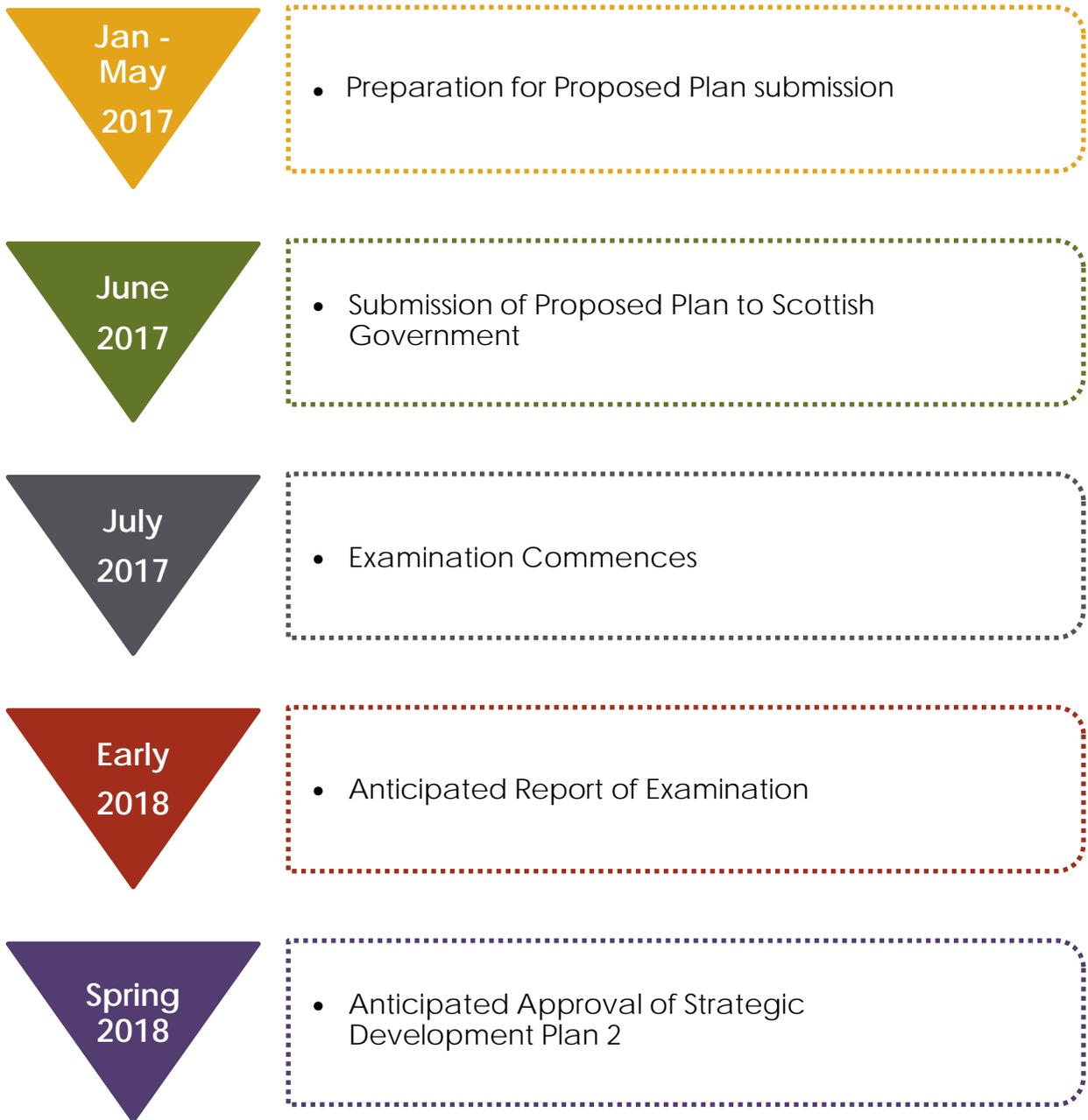
### Delivery

The Proposed Plan is accompanied by an Action Programme indicating delivery timescales, how the plan will be delivered and by whom. The Action programme is updated at least every two years and is expected to be updated following approval of the Proposed Plan.

Preparation of Supplementary Guidance on two key subject areas - the Cross-Boundary Transport Contributions Framework and Cross-Boundary Green Network Frameworks for Edinburgh and West and Edinburgh and East is included within the Purposed Plan. These documents are expected to be published within one year of Plan approval and will be used to inform Local Development Plans and others to deliver these policy areas within the Plan.

## 2 Recent Progress and Future Milestones

**Figure 2.1 Development Plan Timeline**



## Engagement and Participation 3

**Participation Statement****Our aims**

*We will raise awareness of Strategic Development Planning in SESplan while engaging and involving key stakeholders throughout the plan making process.*

We will:

- Develop awareness of SESplan through communication and promotion;
- Seek ways to engage with and involve key stakeholders throughout the whole process of producing the Strategic Development Plan;
- Make information available as early as possible;
- Produce information in an easy to use format;
- Ensure that arrangements for participation are as inclusive and open as possible; and
- Offer the opportunity to be involved to as many stakeholders as possible.

SESplan will use a number of tools to reach as wide an audience as possible using methods which are practical and available to us. In particular we will:

- Make extensive use of electronic communication including our website, social media, consultation portal and those of our Local Authority partners, to promote plan awareness and encourage engagement;
- Build on existing partnerships and working relationships, for example with key agencies and regional economic groups, to facilitate greater input; and
- Develop individual strategies on how best to engage with key stakeholders, recognising the limitations of a one size fits all approach.

**Best Practice**

SESplan aim to exceed the minimum requirements as set out in the Planning etc, (Scotland) Act 2006 and supporting Regulations. To facilitate this we will:

- Look to guidance, such as that provided by PAS (Planning Aid Scotland) and other resources, when completing and assessing our engagement plans and actions;
- Make our engagement plans public documents available before periods of engagement;
- Ensure material is written in clear, plain English with attractive and effective graphics; and
- Communicate with stakeholders throughout the consultation process and provide updates as the plan progresses.

### 3 Engagement and Participation

#### Overview of Engagement for SDP2

1. **Spring 2014 - Influence the Plan public Early Awareness Raising.** This was the first stage of input to the second Main Issues Report. The purpose was to generate interest, increase awareness of and get early input into the Main Issues Report.
2. **Summer 2014 - Housing Need and Demand Assessment Consultation.** This consultation ran for 8 weeks and included 4 public events.
3. **Preparation of Main Issues Report** - During the preparation of the Main Issues Report discussions were held with relevant stakeholders and key agencies to inform the content of the document.
4. **The Main Issues Report consultation:** This took place in summer/autumn 2015 over a 10 week period. The responses are being used to inform the proposed Strategic Development Plan.
5. **Early 2016 - Preparation of the Proposed Strategic Development Plan:** Stakeholders including Key Agencies and member authorities were involved in the preparation of the Proposed Plan.
6. **October - November 2016 - Proposed Strategic Development Plan:** Consultation took place over a six week period and all stakeholder were invited to make representations on the plan.

Figure 3.1 Recent Engagement



## Engagement and Participation 3

### Proposed Plan Consultation Overview

**3.1** SESplan's consultation during the preparation of the proposed plan took the form of three stages. This included early engagement through a survey prior to the Main Issues Report in 2014, an extended period of consultation including public events for the Main Issues Report in 2015 and further public events as part of the Proposed Plan Publication in 2016. Meetings and workshops also took place throughout the period with Key Agencies and other stakeholders.

**3.2** SESplan have succeeded in increasing the number of individuals and community groups who have made comment on Plan documents or attended consultation events.

### Key Proposed Plan Activities

**3.3** SESplan employed a range of techniques to promote the SESplan Proposed Plan to ensure coverage of different stakeholders and demographics. These have included:

updating our website to become more user friendly and making it clear where people can access the Proposed Plan;

- use of social media in particular twitter to promote the plan at all stages (noting that our followers have significantly increased);
- use of posters in libraries and council buildings;
- emails and letters sent to everyone on the SESplan database (over 1000 individuals, organisations and groups);
- emails and letters sent by SESplan member authorities to those on LDP contact databases;
- an attractive SESplan Proposed Plan leaflet was produced giving an 'easy read' explanation of what the plan did, who SESplan are, how and when to respond and how to contact us;
- over 250 Community Councils in the region sent an information pack containing a copy of the Proposed Plan, SESplan Proposed Plan leaflet and posters they could use;
- public events took place in each of the six member authorities including a drop-in session, presentation and Q&A. All documents and large format diagrams were made available and members of SESplan and LDP teams were in attendance to answer questions;
- three press releases and a press advert where used to promote the publication of the plan;
- copies of the plan where made available in council offices and all libraries in the region;
- and,
- in addition, the Proposed Plan was made available on our website two months before publication started and we wrote to everyone who had previously responded to a SESplan consultation to let them know.

### Best Practice

**3.4** To aid engagement SESplan prepared and overarching Stakeholder Strategy and Proposed Plan Engagement Action Programme and made these publically available in advance of the publication of the plan. These looked at how we would engage with particular stakeholders. Comments on these documents were also invited.

**3.5** SESplan also assessed the proposed actions of the Proposed Plan consultation against PAS's SP=EED principles to ensure the activities met with best practice advice.

### 3 Engagement and Participation

#### Plan Production

- SESplan worked with A+DS to storyboard the plan to make it a well presented, graphics based and well laid out document which would be easy to find information in. Specifically, we used colour coding to sections, produced a ‘vision index’ page aligning the content of the vision with the content of the plan;  
Diagram/maps were produced with the aim of using a consistent format that was attractive and conveyed complex spatial planning information in an understandable way;
- SESplan worked to plain English guidance on writing to ensure the text could be as accessible as it could be.

#### Ongoing Engagement

In addition to set consultation periods, SESplan consider it important that communication with key stakeholders and the wider public is maintained. Figure 3.2 sets ongoing activities which SESplan undertake.

**Figure 3.2 Ongoing Engagement**

	Frequency	Description
Development Plan Scheme	Annual	Published at least annually. Describes plan and guidance timescales along with consultation methods. Available on the SESplan Website and in libraries.
SESplan Website	Ongoing	<a href="http://www.sesplan.gov.uk">www.sesplan.gov.uk</a> updated frequently with news. Contains all current and proposed SESplan publications and committee papers.
Consultation Portal	Ongoing	Updated when new consultations commence and gives continuous access to comments on previous SESplan consultations.
Contacts Database	Ongoing	List of contact details for people who have responded to SESplan consultations or have signed up for information. Used to give news and updates on the Plan.
Social Media	Ongoing	Regular use of Twitter and growing followers. Used to post updates and planning news.
SDPA Liaison	Annual	The four SDPAs meet at least annually to shared ideas and best practice.

## How to get Involved 4

SESplan aim to make it as easy as possible for people to get involved in preparing the Strategic Development Plan by making access to information and communication with us as straightforward as possible. Updates on the plan's progress and opportunities for comment will be well publicised at all key stages. The main way to keep up to date is through our website [www.sesplan.gov.uk](http://www.sesplan.gov.uk) and our online consultation portal [sesplan-consult.objective.co.uk/portal](http://sesplan-consult.objective.co.uk/portal).

On our website you will find:

- All Strategic Development Plan related documents;
- Details of upcoming SESplan Joint Committees and the papers;
- Up to date news of progress on the Strategic Development Plan and other related news stories and press releases;
- Details of upcoming SESplan related events; and
- Links to relevant websites including our consultation portal.
- The SESplan Consultation Portal gives you the opportunity to get involved in consultations and tell us what you think. Your views are important to us and we take them into consideration when making decisions about what we do and how we do it. You can use the portal to:

- Search and view current and past consultations;
- Submit comments online on live consultations; and
- Access the results of past consultations.
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You can register for the portal here: [sesplan-consult.objective.co.uk/common/register](http://sesplan-consult.objective.co.uk/common/register)

### Contact Us

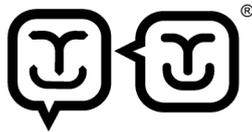
If you want to be involved in the process you can contact us by:

Telephone: **01506 282883**

Email us at: **contactus@sesplan.gov.uk**

In writing:

**SESplan, Civic Centre, Howden South Road, Livingston, EH54 6FF**



## HAPPY TO TRANSLATE

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**ITEM 8 – 2016 Annual Housing Update**

Report by: Graeme Marsden, Planner

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**Purpose**

This Report presents the 2016 Annual Housing Update to the SESplan Joint Committee for consideration and noting. The Joint Committee are also asked to agree that it will not be produced by a specific December timescale.

**Recommendations**

It is recommended that the SESplan Joint Committee:

1. Note the summary and content of the Annual Housing Update, attached as Appendix 1 to this report; and
2. Agree that the Annual Housing Update should be produced on an annual frequency instead of by a specific end of year timescale.

**Resource Implications**

As set out below.

**Legal and Risk Implications**

All risks are detailed in the SESplan Risk Register and reported to Joint Committee on an annual basis.

**Policy and Impact Assessment**

No separate impact assessment is required.

**1. Background**

- 1.1 On 18 May 2015, the SESplan Joint Committee approved non statutory guidance on maintaining a five year effective supply of housing land. The guidance indicates that an Annual Housing Update will be prepared for consideration by SESplan by no later than December each year. The updates are to

consider the effective land supply and performance against the approved SDP and comment on other factors such as completions and significant appeal decisions.

1.2 The updates will assist in monitoring the development plan, inform future plans and add to the context for the consideration of proposals within the SESplan area.

1.3 The first update was reported to the 30 May 2016 Joint Committee Meeting. This second update covers the period 1 April 2015 to 31 March 2016 and is based on member authorities' housing land audits.

## **2. Annual Housing Update 2016**

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2.1 The Update begins with a short summary, key points being that the 80% of the established land supply is considered 'effective' and the number of house completions by 25% compared to the previous year. The Update examines the supply of housing land and the delivery of new homes as separate points. This approach and other issues around measuring the effective housing land supply is subject to ongoing discussion with other members of Heads of Planning Scotland and Homes for Scotland. The Scottish Government is aiming to issue updated guidance on housing land following the review of the planning system in Scotland.

2.2 The housing land supplies identified in the 2016 Update reinforce the point made in paragraph 5.8 of the Proposed Plan. This is that, with the possible exception of Edinburgh, other SESplan member authorities are not expected to be required to allocate additional housing land in the subsequent Local Development Plans to meet the Proposed Plan Housing Land Requirements, as there is estimated to be sufficient levels of housing land. For all SESplan member authorities the level of housing land to be allocated will depend on the estimates of housing land at the time of Local Development Plan preparation.

2.3 Due to the SESplan focus on responding to the Proposed Plan representations and preparing for submission, there is no analysis of 2016 planning appeals in this year's Update.

## **3. Future Annual Housing Updates**

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3.1 The Annual Housing Update was programmed to be taken to the November 2016 SESplan Joint Committee. However, only three of the SESplan member authorities housing land audits were

completed at this point. Therefore work on the Annual Housing Update could not progress until February 2017 when drafts of all audits were available.

- 3.2 The 2015 Annual Housing Update was delayed for similar reasons. Therefore the SESplan Operational Group has been asked to look at the use of shared resources to allow the production of housing land audits within a consistent timescale. In the interim the Joint committee is asked to change the timescale for the production of the Annual Housing Update from December to annually as SESplan member authorities cannot guarantee that Housing Land Audits will be produced within that timescale.

## Appendices

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Appendix 1                      2016 SESplan Annual Housing Update

**Report Contact – Graeme Marsden, Planner, [graeme.marsden@sesplan.gov.uk](mailto:graeme.marsden@sesplan.gov.uk), 01506 282881**

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Report Agreed By - Alice Miles, Acting SDP Manager, [alice.miles@sesplan.gov.uk](mailto:alice.miles@sesplan.gov.uk), 01506 282880



# SESplan Annual Housing Update 2016

## 1. Summary

- 80% of land identified for housing in the SESplan area is classified as “effective”.
- The total supply of effective housing land in the SESplan area is 13% higher than in 2015.
- The number of houses completed during the year is 25% higher than the previous year.
- The total effective housing land supply is greater than the housing land requirement for SESplan as a whole and all council areas except for East Lothian and Scottish Borders.
- The five year delivery programme is below the five year delivery target for all council areas.
- At current delivery programme rates, there is enough effective housing land for at least 10 years in all council areas.
- At recent completion rates, there is enough effective housing land for at least 15 years in all council areas.

## 2. Introduction

- 2.1. On 18 May 2015, the SESplan Joint Committee approved non statutory guidance on maintaining a five year effective supply of housing land. The guidance indicates that an Annual Housing Update will be prepared for consideration by SESplan. This document represents the second update, the first being reported to the SESplan joint committee on 30 May 2016.
- 2.2. Each of the six SESplan local authorities conducts an annual audit of the housing supply within their own area. The audits measure the amount of land that is available for housing including land allocated for housing in local development plans, land with planning consent for housing and other land with agreed potential. The audits also attempt to estimate delivery of new homes and include a delivery programme for the next seven years. City of Edinburgh, Fife and Midlothian councils have finalised audits for 2016. East Lothian, Scottish Borders and West Lothian currently have 2016 audits at draft stage and are yet to agree these with Homes for Scotland.
- 2.3. It should be noted that the housing land position set out in this update paper advises of housing land requirements to meet those of the approved 2013 Strategic Development Plan (SDP1) and its associated Housing Land Supplementary Guidance informed by the 2011 Housing Needs and Demand Assessment (HNDA 1). In 2015 a new Housing Needs and Demand Assessment (HNDA 2) was confirmed as ‘Robust and Credible’ by the Scottish Government and is the most up to date assessment of housing need and demand across the SESplan area. HNDA 2 has informed the preparation of the SESplan Proposed Plan (SDP2), which will eventually replace SDP1 in 2018. The Proposed Plan is anticipated to be submitted to Scottish Government in June 2017 for Examination.
- 2.4. HNDA 2 is informed by the 2012 Based Household Projections, as opposed to the 2008 based projections which were the basis of HNDA 1 and SDP1. The Proposed Plan indicates a shift in the scale of housing land and tenure that will be required across the SESplan area over the period 2018-2030. This will have an impact on housing supply targets used in

future iterations of this update paper which will assess targets for market housing and affordable housing separately.

- 2.5. The Proposed Plan is the most up to date statement of housing land policy across the SESplan area and is based on the most up to date assessment of housing need and demand in that area. Housing Supply Targets in the Proposed Plan are below those currently needed to meet the remaining requirement set by SDP1. As such, testing the five year delivery programme against the Housing Supply Targets in SDP2 will result in a reduced deficit or an excess in programmed delivery against delivery the targets than is shown in table 6.

### 3. Housing Land Supply

#### Established land supply

- 3.1. Scottish Government's planning advice note 2/2010 (PAN2/2010) "Affordable Housing and Housing Land Audits" defines the established land supply as "The total housing land supply - including both unconstrained and constrained sites. This will include the effective housing land supply, plus the remaining capacity for sites under construction, sites with planning consent, sites in adopted local development plans and where appropriate other buildings and land with agreed potential for housing development."

#### Effective land supply

- 3.2. In order for a housing site to be considered **effective**, it must be free of all constraints that would prevent development. Sites are considered against a range of criteria set out in PAN 2/2010. These criteria include ownership, physical (e.g. slope, aspect, stability, flood risk, access), contamination, deficit funding, marketability, infrastructure and land use.
- 3.3. In March 2016, Scottish Government issued draft delivery advice on housing and infrastructure. This advice, once finalised, will replace PAN 2/2010 in terms of assessing the effective land supply. The draft advice removed marketability as a necessary criterion in assessing housing land as effective, and the five year effective land supply is not defined in terms of the programme of expected future completions. The effective land supply is defined as 'the part of the established housing land supply which is free of development constraints in the period under consideration and will therefore be available for the construction of housing'. Scottish Government aims to issue finalised advice following the review of the planning system in Scotland.
- 3.4. Table 1 below details the established land supply in SESplan and its constituent local authorities at 31 March 2016. These data are illustrated graphically in figures 2 and 3.

Table 1. Established land supply

	Established land supply	Effective land supply	Land with constraints
City of Edinburgh	33,020	25,748	7,272
East Lothian	6,281	6,241	40
Fife (SESPLAN)	30,847	24,655	6,192
Midlothian	13,884	13,235	649
Scottish Borders	8,994	6,895	2,099
West Lothian	24,446	17,313	7,133
<b>SESplan</b>	<b>117,472</b>	<b>94,087</b>	<b>23,385</b>

Figure 1. Established land supply by local authority area

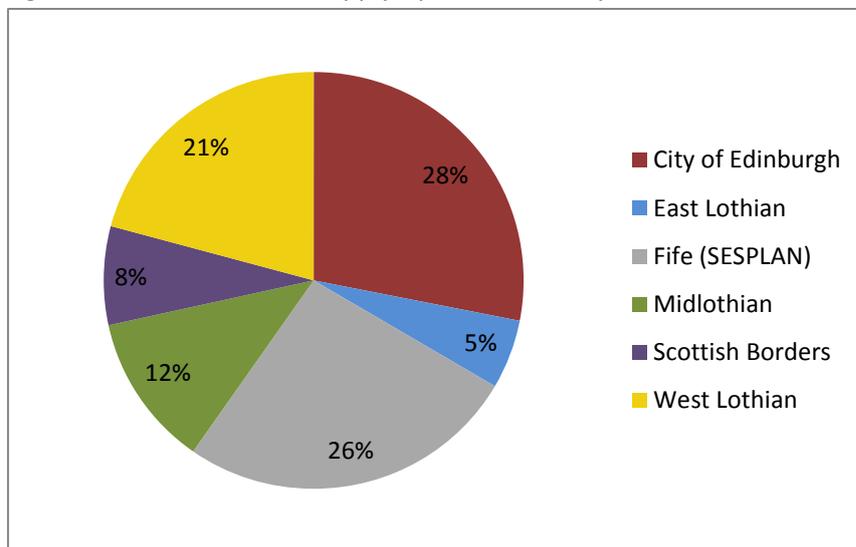
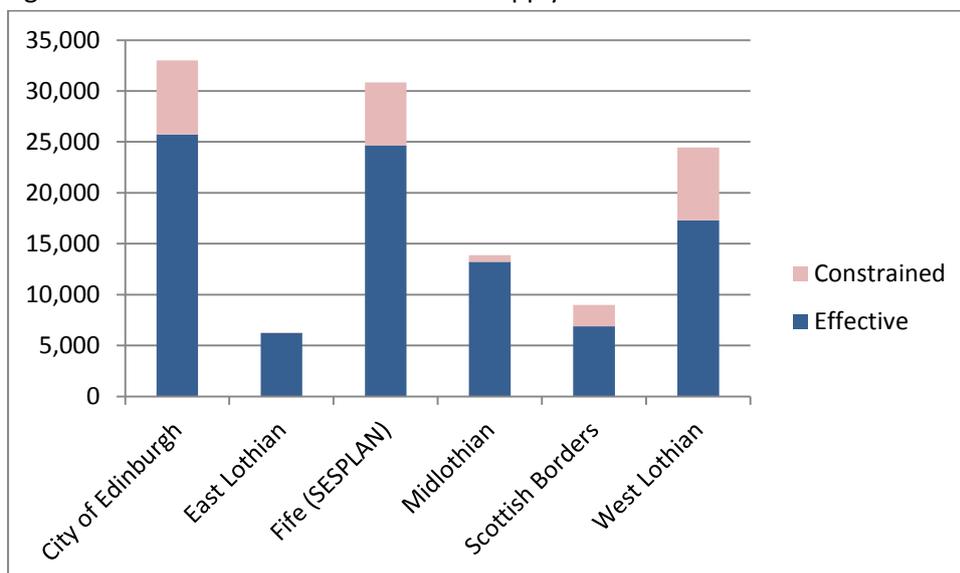


Figure 2. Effective and constrained land supply



3.5. At 94,087, the total effective land supply across the SESplan area is 13% higher than the previous year when the total effective land supply was recorded as 83,497. Only Fife and East Lothian recorded a lower effective land supply in 2016 than in 2015.

3.6. The authorities with the greatest proportion of the established land supply classified as effective are East Lothian (99%) and Midlothian (95%). West Lothian has the lowest proportion of its land supply classified as effective at 71%.

#### 4. Housing Delivery

##### Housing completions

4.1. Between April 2015 and March 2016, there have been 5,175 new houses completed across the SESplan area. This represents a 25% increase on the number of houses completed the previous year (4,138) and is the highest completion count since 2008/09 when the credit crunch brought about a considerable reduction in new house building.

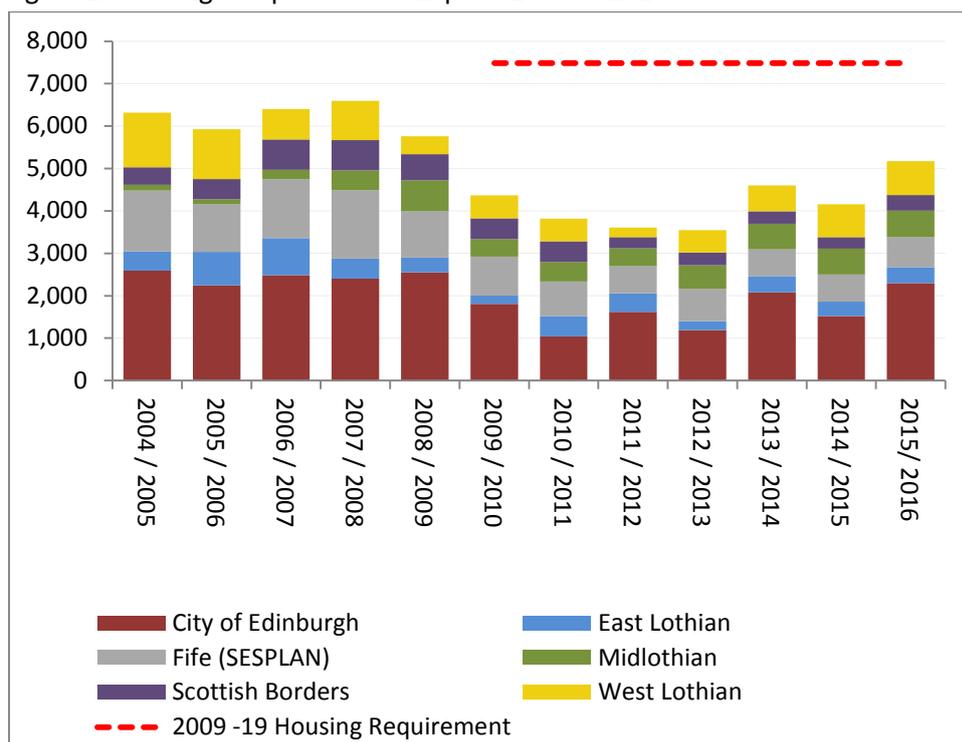
4.2. Of the 5,175 houses completed during the year, 44% were located in the City of Edinburgh Council area (2,297). West Lothian accounted for the second highest completions count at 797 followed by Fife (713), Midlothian (620) East Lothian (375) and Scottish Borders (373).

4.3. Completions in 2015/16 were higher than the previous year for all SESplan authorities, and with the exception of East Lothian, the completions counts are the highest that they have been for at least 5 years. It should be noted that completions fluctuate from year to year and the large increase in completions over the last year may not continue as a trend. Looking at change in completion rates over a single year can be misleading as a relatively small number of flatted developments reaching completion within in a single year can mask the fact the construction had actually taken place over a longer period and appear as a spike in yearly completions trends.

4.4. Figure 2 below shows the number of houses completed across the SESplan area since 2004. The dotted line in the graph shows the average annual completions rate that would have been necessary to meet the housing supply target to 2019.

4.5. Completion figures split by tenure are not currently available.

Figure 2. Housing completions in SESplan: 2004 to 2016



Delivery programme

4.6. Each of the housing land audits estimates likely completions on sites classified as effective over the next 7 years. The programme has largely been agreed as accurate with Homes for Scotland members in Edinburgh, Fife and Midlothian. The figures for East Lothian, Scottish Borders and West Lothian are draft and have not yet been agreed. The delivery programme for the next 5 years for SESplan and its LDP areas is set out in table 2 below.

Table 2. Delivery programme

	<b>Delivery programme 2016 to 2021</b>	<b>Annual average</b>
City of Edinburgh	11,970	2,394
East Lothian	3,187	637
Fife (SESPLAN)	7,930	1,586
Midlothian	5,629	1,126
Scottish Borders	3,389	678
West Lothian	7,717	1,543
<b>SESplan</b>	<b>39,822</b>	<b>7,964</b>

## 5. Housing Land Requirement

5.1. The housing land requirement for SESplan and its LDP areas is set out in table 3.1 of the SESplan Supplementary Guidance on Housing Land (November 2014). The table is reproduced in table 3 below.

Table 3. Housing land requirement 2009 to 2024

	<b>2009 - 2019</b>	<b>2019 - 2024</b>
City of Edinburgh	22,300	7,210
East Lothian	6,250	3,800
Fife (SESPLAN)	17,140	7,430
Midlothian	8,080	4,410
Scottish Borders	9,650	3,280
West Lothian	11,420	6,590
<b>SESplan</b>	<b>74,840</b>	<b>32,720</b>

4.1. SDP1 and its supplementary guidance (SG) were prepared in accordance with Scottish Planning Policy (SPP) 2010. SPP was replaced in 2014. The new SPP required development plans to set housing supply targets (HSTs) as well as housing land requirements. The HST is the policy view of the number of new homes that will be delivered. The housing land requirement is the amount of land to be allocated to allow the targets to be met. However, SDP1 was approved in accordance with the 2010 SPP and therefore there is not a clear approach to generosity and housing land requirements.

4.2. Taking account of completions to date, the remaining requirement is given in table 4 below. The approaches taken to identify housing land requirements are set out under the table.

Table 4. Outstanding housing land requirement from 2016

	Requirement 2009 - 2019	Complete 2009 - 2016	Requirement 2016 - 2019	Requirement 2019 - 2024	Remaining * Requirement
City of Edinburgh**	22,300	11,565	10,735	7,210	22,912
East Lothian	6,250	2,413	3,837	3,800	7,637
Fife (SESPLAN)***	17,140	5,118	12,022	7,430	19,452
Midlothian	8,080	3,664	4,416	4,410	8,826
Scottish Borders****	9,650	2,483	7,167	3,280	10,939
West Lothian *****	11,420	4,012	7,408	6,590	13,998
<b>SESplan</b>	<b>74,840</b>	<b>29,255</b>	<b>45,585</b>	<b>32,720</b>	<b>83,764</b>

\* The period for the housing land requirement is 2016 to 2026 for Edinburgh and Fife, 2016 to 2025 for Scottish Borders and 2016 to 2024 for all other councils

\*\*The adopted Edinburgh LDP added an additional 2,884 units to the SDP requirement figure to account for the period 2024 to 2026. The LDP also treated the SDP requirement as a housing supply target and so the remaining requirement figure increases the total requirement for the period 2016 to 2026 by 10% to become the requirement for housing land and provide sufficient flexibility.

\*\*\* The propose Fife Local Development Plan, modified for adoption (February 2017), increased the SDP housing land requirement by 2,591 to account for the period 2024 to 2026. No generosity margin was added.

\*\*\*\*The adopted Scottish Borders LDP added an additional 492 units to the SDP requirement to account for the period 2024 – 2025. No generosity margin was added.

\*\*\*\*\* The West Lothian proposed LDP adds 10% to the SDP requirement for the period 2009 to 2024, increasing the remaining requirement by 1,801

## 5. Housing Delivery Target

5.1. The five year housing delivery target is the number of new homes that would need to be built over the next 5 years to meet the target set by the SDP for the period up to 2019 and beyond, to 2024. It is calculated as the remaining requirement to 2019 (3 years), plus 2 fifths of the target for 2019 to 2024. The five year delivery target for SESplan and its LDP areas is set out in table 5 below.

Table 5. Five year delivery target

	Target 2016 - 2019	Target 2019 - 2024	5 Year Target
City of Edinburgh	10,735	7,210	13,619
East Lothian	3,837	3,800	5,357
Fife (SESPLAN)	12,022	7,430	14,994
Midlothian	4,416	4,410	6,180
Scottish Borders	7,167	3,280	8,479
West Lothian	7,408	6,590	10,044
<b>SESplan</b>	<b>45,585</b>	<b>32,720</b>	<b>58,673</b>

## 6. Assessing the Adequacy of the Land Supply and Delivery Programme

- 6.1. The adequacy of the supply of land for housing and the programmed delivery of new homes are assessed as separate things. The five year delivery programme, previously referred to as the five year effective land supply, need not be the only factor to consider when determining whether the supply of effective land is adequate. Where the delivery programme is below the five year delivery target but there is sufficient effective land for more than 5 years development at current delivery rates, councils could consider ways to increase delivery of the existing supply before allocating or releasing additional housing land. Table 6 below compares the effective housing land supply to the housing land requirement and also, the 5 year delivery programme to the five year delivery target. Table 6 also shows how long, in years, the effective land supply will last should delivery programme rates from Housing Land Audits be achieved. Delivery programme rates are calculated as the average number of completions programmed over the next five years. Table 6b gives an alternative calculation to the number of years of effective land whereby the average completion rate over the last five years is used.
- 6.2. The table demonstrates that for SESplan as a whole and for each LDP area with the exception of East Lothian and Scottish Borders, there is sufficient effective housing land to meet the housing land requirement for the entire plan period. Within East Lothian and Scottish Borders, although insufficient for the full plan period, there is sufficient effective land to last for 10 years at current build rates. It should be noted that SPP does not require there to be sufficient effective land for the whole plan period. Rather, it states “The housing land requirement can be met from a number of sources, most notably sites from the established supply which are effective or expected to become effective in the plan period...”
- 6.3. The delivery programme, however, is below the 5 year delivery target for all 6 LDP areas. This is largely the product of lower than required house building during the early years of the SDP period following the credit crunch, leading to unachievable targets in the first period to 2019. In order to meet the five year delivery target, an average completions rate of 11,735 new homes per year would be needed across the SESplan area. 6,598 is the highest completions rate achieved since the early 2000s with the average for the last five years being 4,218.
- 6.4. The five year delivery target is closest to being met in Midlothian where the delivery programme is 90% of the target followed by City of Edinburgh at 88%. The delivery programme is furthest from the target in Scottish Borders at 40%. For SESplan as a whole, the 5 year delivery programme is 68% of the target.
- 6.5. Several factors affect the rate of delivery on effective sites. Work is underway with Homes for Scotland to develop a systematic way to identify the factors which would accelerate delivery rates on relevant sites. This is being piloted in Edinburgh. This approach has potential to provide additional information in the report of the 2017 audits.

**Table 6. Housing land supply and delivery programme**

Land Supply		Delivery output	
<b>Edinburgh</b>			
Housing Land Requirement (2016 - 2026)	22,912	5 year delivery target	13,619
Effective Housing Land Supply	25,748	5 year delivery programme	11,970
No. of years effective supply	11	% of target	88
<b>East Lothian</b>			
Housing Land Requirement (2016 - 2024)	7,637	5 year delivery target	5,357
Effective Housing Land Supply	6,241	5 year delivery programme	3,187
No. of years effective supply	10	% of target	59
<b>Fife (SESplan)</b>			
Housing Land Requirement (2016 - 2026)	22,043	5 year delivery target	14,994
Effective Housing Land Supply	24,655	5 year delivery programme	7,930
No. of years effective supply	16	% of target	53
<b>Midlothian</b>			
Housing Land Requirement (2016 - 2024)	8,826	5 year delivery target	6,180
Effective Housing Land Supply	13,235	5 year delivery programme	5,629
No. of years effective supply	12	% of target	91
<b>Scottish Borders</b>			
Housing Land Requirement (2016 - 2025)	10,939	5 year delivery target	8,479
Effective Housing Land Supply	6,895	5 year delivery programme	3,389
No. of years effective supply	10	% of target	40
<b>West Lothian</b>			
Housing Land Requirement (2016 - 2024)	13,998	5 year delivery target	10,044
Effective Housing Land Supply	17,313	5 year delivery programme	7,717
No. of years effective supply	11	% of target	77
<b>SESplan</b>			
Housing Land Requirement	83,764	5 year delivery target	58,673
Effective Housing Land Supply	94,087	5 year delivery programme	39,822
No. of years effective supply	12	% of target	68

**Table 6B. Number of years effective supply based upon past completion rates**

	<b>Effective Land Supply</b>	<b>Average completions 2011 - 2016</b>	<b>No. of years effective supply</b>
City of Edinburgh	25,748	1,743	15
East Lothian	6,241	348	18
Fife (SESplan)	24,655	677	36
Midlothian	13,235	562	24
Scottish Borders	6,895	301	23
West Lothian	17,313	588	29
<b>SESplan</b>	<b>94,087</b>	<b>4,219</b>	<b>22</b>

**ITEM 9 – FINANCE**

Report by: Alice Miles, Acting SDP Manager

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**Purpose**

This Report presents an update on the SESplan Operating Budget for 2016 / 2017 and 2017 / 2018 following the discussions at the SESplan Joint Committee on the 24 November 2016.

**Recommendations**

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It is recommended that the SESplan Joint Committee:

1. Note the updated forecast expenditure against the approved Operating Budget for 2016 / 2017 set out within Appendix 2 to this Report;
2. Approve the updated Operating Budget for 2017 / 2018 set out within Appendix 2 to this Report;
3. Note that member contributions for financial year 2017 / 2018 have been reduced and are set at £44,000 (excluding VAT) per authority (as set out within Appendix 2 to this Report), payable to Fife Council by the 30 April 2017;
4. Note that member authorities are required to ratify the decisions above and to make their required contributions subsequently; and
5. Note that an Operating Budget for 2018 / 2019 will be brought to the November 2017 meeting of the SESplan Joint Committee.

**1. Background**

- 1.1 The SESplan Financial Rules set out that Operating Budgets for the next financial year should be proposed by the SDP Manager, approved by the SESplan Joint Committee and that decision ratified by the member authorities by the end of December. In compliance with these rules, the SESplan Joint Committee at its meeting on the 24 November considered:

- Expenditure against the approved Operating Budget for 2016 / 2017 up to October 2016;
- Total forecast expenditure against the approved Operating Budget for 2016 / 2017; and
- Operating Budget for 2017 / 2018 and indicative Operating Budgets for 2018 / 2019 and 2019 / 2020.

1.2 The SESplan Joint Committee agreed to approve the Operating Budget for 2017 / 2018 in principle and that a review of SESplan expenditure and future budgets would be brought to the next meeting in March 2017.

## **2. SESplan Operating Budget 2016 / 2017**

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2.1 The SESplan Joint Committee considered the latest position on the Operating Budget for the financial year 2016 / 2017 as at October 2016 (see Appendix 1). The latest position as at February 2017 is included as Appendix 2.

2.2 The largest spend by SESplan is on staffing. As set out in Appendices 1 and 2, the total forecast for staffing at October 2016 was estimated at just over £197,000. The position as at February 2017 is just under £205,000. The increase in staffing over the period October 2016 – March 2017 is related to the publication of the Proposed Plan and preparation for Submission. Tasks have included running events through the period for representations, logging all representations received by email and letters, summarising all 802 representations, preparing the summary of unresolved issues within 25 Schedule 4s and preparing for Joint Committee. From publication of the Proposed Plan in October 2016 to reporting the SESplan responses to the representations received in the Schedule 4 format to the SESplan Joint Committee will have taken 19 weeks. Across the member and other strategic authorities, this process has taken on average 41 weeks.

2.3 The approved Operating Budget 2016 / 2017 includes a total staffing budget of just over £227,000. Therefore whilst the updated position shows an overspend in staffing on the estimates reported to Joint Committee in November, overall when the latest February 2017 position is compared with the approved Operating Budget for 2016 / 2017 there is a saving in staffing of just under £23,000.

- 2.4 The Operating Budget for 2016 / 2017 also includes other fixed costs relating to accommodation, audit fees (professional fees), IT software and hardware, training and travel. The forecast considered by Committee in November 2016 was a spend in these areas of just under £33,000 (see Appendix 1). The updated forecast at February 2017 (See Appendix 2 for more detail) is a spend in these areas of just over £32,000.
- 2.5 Overall at November 2016, it was estimated that there would be a saving across all fixed costs of around £34,200. The final position at February 2017 is that there will be an underspend of around £27,600. This is some £6,600 below the position reported to the Joint Committee, however the final underspend still represents a 10% saving on the fixed costs in the approved Operating Budget for 2016 / 2017.
- 2.6 The approved 2016 / 2017 Operating Budget also includes an allowance of £22,000 for variable costs. The largest spend in 2016 / 2017 was related to the Transport Appraisal of SDP2. This was estimated at £16,000 with final costs around £13,000, an underspend of just over £3,000. This spend was partially spent in financial year 2015 / 2016, with the balance of around £8,900 paid from financial year 2016 / 2017. There has been an overspend in printing / photocopying of the Proposed Plan. The approved Operating Budget did not include costs for sending hard copies of the Proposed Plan to each of the 257 community councils within the SESplan area. This additional printing therefore incurred additional costs. Overall, the position reported to Committee in November was an overspend in variable costs of £5,500. The updated position at February 2017 now shows an underspend in variable costs against the approved Operating Budget of around £1,800.
- 2.7 Across the entire Operating Budget for 2016 / 2017, the updated position as at February 2017 is not markedly different from that reported to Joint Committee in November 2016. The updated position at February 2017 is that there will be an overall underspend on the approved SESplan Operating Budget 2016 / 2017 of around £29,400. This represents a 10% saving.

### **3. SESplan Operating Budget 2017 / 2018**

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- 3.1 Table 1 below provides an outline summary of the Work Programme for financial year 2017 / 2018.

**Table 1 – Core Team Summary Work Programme 2017 / 2018**

Task	Period	Weeks
<p><b>Submission of SDP2</b></p> <ul style="list-style-type: none"> <li>- Final format all Schedule 4s as per DPEA requirements</li> <li>- For all Schedule 4s (in hard copy and electronic format) - Prepare Contents Page, Source relevant extract of Representee and Authority Supporting Documents and highlight relevant text and Compile relevant Representations any supporting information.</li> <li>- Compile Core Documents</li> <li>- Set up Contacts List</li> <li>- Draft Advert for Notification of Submission</li> <li>- Draft Letter requesting Examination</li> <li>- Mail out to all Representees advising of Submission</li> </ul>	<p>13 Mar – 2 Jun 2017</p>	<p>12 Weeks</p>
<p><b>Examination of SDP2</b></p> <ul style="list-style-type: none"> <li>- Assessment of Compliance with Report of Conformity</li> <li>- Examination formally commences</li> <li>- Examination / Period for Further Information Requests</li> <li>- Hearing</li> <li>- Target Date for Report of Examination</li> <li>- Ministers consider Examination Report and Approve, Modify or Reject the Plan</li> <li>- Edit and publish final SDP2, Prepare Post Adoption SEA Statement for submission to SEA Gateway and Habitats Regulation Appraisal for submission to SNH and Publish Action Programme</li> </ul>	<p>2 Jun – 14 Jul 2017                      14 Jul 2017                      Jul 2017 – Mar 2018                      Dec 2018                      Mar 2018                      Mar – May 2018                      May – Aug 2018</p>	<p>6 Weeks                       33 Weeks                      4 Weeks                       8 Weeks                      12 Weeks</p>
<p><b>Supplementary Guidance</b></p> <ul style="list-style-type: none"> <li>- Cross Boundary Developer Contributions Framework</li> <li>- Cross Boundary Green Network Priority Areas                             <ul style="list-style-type: none"> <li>&gt; South East</li> <li>&gt; Edinburgh and West</li> </ul> </li> <li>- Heat (TBC through SDP2 Examination)</li> <li>- Minerals (TBC through SDP2 Examination)</li> <li>- Wind (TBC through SDP2 Examination)</li> </ul>	<p>Preparation of Draft x 3 (x 6)                      Joint Committee Approval –                      Mar 2018                      Consultation Apr – May 2018                      Joint Committee Approval of                      Modified Guidance (if                      Required) – Sept 2018                      Submit to Scottish                      Government – Dec 2018</p>	<p>24 Weeks                       6 Weeks</p>

Page 412

Task	Period	Weeks
<b>Evidence Gathering</b> <ul style="list-style-type: none"> <li>- Monitoring Statement</li> <li>- Housing Need and Demand Assessment</li> <li>- Identifying Housing Supply Targets</li> <li>- Spatial Strategy Assessment</li> </ul>	Project Plan – Jan 2018	
<b>Other Workstreams</b> <ul style="list-style-type: none"> <li>- Development Plan Scheme 10</li> <li>- Finance (Unaudited and Audited Accounts, Monitoring Reports, Annual Audit, Operating Budget 2018 / 2019)</li> <li>- Annual Report / Planning Performance Framework</li> <li>- Risk Management</li> <li>- Joint Committee Work Plan</li> <li>- Annual Housing Land Update</li> </ul>	Feb – Mar 2018 Jun, Sep and Nov 2017, Mar 2018 Jul 2017 Nov 2017 Nov 2017 Nov 2017	8 Weeks   4 Weeks 4 Weeks 4 Weeks 4 Weeks

- 3.2 Over the first two months of the 2017 / 2018 financial year, the Core Team will be focussed on preparing the Submission package for Examination. On the basis of the TAYplan and CLYDEplan Examinations it is anticipated that Further Information Requests will begin to be received around mid-October 2017, with a Hearing in mid-December. The Report of the Examination is anticipated to be received around the beginning of March 2018, with approval of SDP2 in May 2018.
- 3.3 The Proposed Plan states that Supplementary Guidance will be required to be prepared on Cross Boundary Developer Contributions Framework and Green Network Priority Areas for Key Areas of Change South East and Edinburgh and West. The response on the Proposed Plan from Scottish Government advised that further work is required on heat, wind and minerals and that this work should also take the form of Supplementary Guidance. SESplan disagrees that further Supplementary Guidance is required in these areas; however the requirement to prepare this additional guidance is dependent on the outcome of the Examination. The Reporter may be so minded to require Supplementary Guidance is prepared. Any Supplementary Guidance will be required to be approved within one year of Plan approval i.e. no later than May 2019.
- 3.4 The staffing assumptions reported to Joint Committee in November 2016 remain the same; however it is anticipated that savings will be made in staffing over the 2017 / 2018 financial year (the Planner post for example will be vacant from April 2017). These savings will be fed into the SESplan reserves where it is anticipated that significant savings both in the Operating Budget and member contributions will be made in financial year 2018 / 2019 (see Section 4 below).
- 3.5 For other fixed costs within 2017 / 2018, costs remain largely the same (assumed at £32,500 in November 2016, updated to £33,300 in February 2017). The training budget has been reduced in line with spend in previous years and the IT software and maintenance costs have been slightly increased to more accurately reflect the spend required. The largest spend on IT is for Objective and the online SESplan Consultation Portal at £11,000. A £1,000 saving has been negotiated with Objective for the next financial year. Costs for accommodation in West Lothian Civic Centre remain the same.

- 3.6 The variable costs within the Operating Budget are slightly reduced from the position in October 2016. Printing / photocopying costs have been reduced from £4,000 to £1,000 reflecting that SDP2 will be approved within financial year 2018 / 2019 and will therefore not require to be printed in this financial year. All other costs remain the same, with a £90,000 allowance for consultancy fees. This includes £30,000 for the Examination into SDP2. Costs for the Examination are estimated and are subject to change dependant on the length and complexity of the Examination. It is prudent to allow a contingency within the variable costs should the costs increase.
- 3.7 The remaining variable budget of £60,000 is for background appraisal to inform the Supplementary Guidance on Developer Contributions. Again exact costs for this work cannot be identified at present as the background appraisal will build on the Cross Boundary Study currently being undertaken by Transport Scotland. The scope of the appraisal will identify which transport interventions we may wish to fund through developer contributions and the subsequent geographies as to where those developer contributions will be sought from. The scope of the appraisal will be confirmed once the Study is published and will also review resources available in-house ensuring minimal spend on consultancy fees where possible.
- 3.8 As detailed in Appendix 1, the Budget for 2017 / 2018 approved in principle in November set out total expenditure of just under £302,000. This was to be met by contributions of £46,550 from each member authority. The updated position at February 2017 is total expenditure of just over £299,000, a saving of around £2,500. Using the reserves built up in 2016 / 2017 and on the assumption that significant savings will be made within the 2018 / 2019 Operating Budget and member contributions, it is proposed that the contributions per member authority for 2017 / 2018 are reduced to £44,000, a saving of £2,550 per member authority.

#### **4. SESplan Operating Budget 2018 / 2019 Onwards**

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- 4.1 Into 2018 / 2019 and following the conclusion of the Examination in early 2018, with approval of SDP2 in May 2018, SESplan will statutorily be required to finalise SDP2 for printing and publication and commence work on the post adoption SEA statement, Habitats Regulation Appraisal and Action Programme. SESplan will also be required to continue progress on corporate workstreams including audit, finance, risk management and performance.

- 4.2 Ordinarily, a timeline for the next SDP, SDP3 would now be identified as the programme for SDP2 comes to an end. However the consultation on the future of the Scottish planning system ([Places, People and Planning](#)) was published in January 2017. This sets out that strategic development plans should be removed from the system so that strategic planners can support more proactive regional partnership working. The remit and role of the proposed Regional Working Partnerships has not yet been identified.
- 4.3 The work of SESplan in 2018 / 2019 other than the statutory requirements referred to above is therefore unknown. On that basis indicative Operating Budgets for 2018 / 2019 and 2019 / 2020 are not shown in Appendix 2. Operating Budgets in these years will be required to be reviewed against the outcome of the ongoing planning review in terms of transitional arrangements, with new finance arrangements agreed as part of the establishment of any Regional Working Partnership. This will continue to be reviewed as the Planning Bill is published and further details are known.
- 4.4 Nevertheless as set out in paragraph 3.4 above it is anticipated that savings will be made in the 2017 / 2018 financial year. These savings will be fed into the SESplan reserves where it is anticipated that significant savings both in the Operating Budget and member contributions will be made in financial year 2018 / 2019.

## 5. Next Steps

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- 5.1 It is requested that member authorities ensure that contributions will be in place by the start of the next financial year and note that an Operating Budget for 2018 / 2019 will be brought to the November 2017 meeting of the Joint Committee.

### Report Contact

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### Appendices

- 
- 1 Updated Operating Budget 2016 / 2017 and Operating Budget 2017 / 2018
- 2 Operating Budget 2016 / 2017 and Operating Budget 2017 / 2018 Updated at February 2017



Appendix 1 - SESplan Operating Budget 2016 / 2017 and Three Year Operating Budget to 2019 / 2020

DESCRIPTION	16/17 Budget	Actual spend Sept- 16	16/17 Forecast	16/17 Variance	17/18 Budget	18/19 Budget	19/20 Budget
SINGLE STATUS BASIC PAY incl Agency	227,199	96,591	197,294	-29,905	160,931	163,969	190,186
TRAINING COSTS	1,000	520	1,000	0	2,000	2,000	2,000
RENTS PAYABLE, incl service charges	9,613	7,376	7,376	-2,237	7,487	7,599	7,713
TRAVEL EXPENSES	5,100	1,611	4,200	-900	4,200	4,200	4,200
IT HARDWARE	0	0	500	500	0	0	0
IT SOFTWARE	16,000	7,200	13,500	-2,500	13,703	13,909	14,118
IT MAINTENANCE	0	684	684	684	0	0	0
MOBILE LINE RENTAL	524	55	200	-324	203	206	209
PROFESSIONAL FEES	3,400	0	3,400	0	3,400	3,400	3,400
EVENT COSTS	0	411	411	411			
MISCELLANEOUS EXPENSES	1,500	0	1,500	0	1,500	1,500	1,500
<b>Fixed</b>	<b>264,336</b>	<b>114,448</b>	<b>230,065</b>	<b>-34,271</b>	<b>193,424</b>	<b>196,783</b>	<b>223,326</b>
<b>Technical Support</b>							
PRINTING/PHOTOCOPYING COSTS	2,500	135	4,000	1,500	4,000	4,000	4,000
CROSS BOUNDARY TRANSPORT PROJECT EXAMINATION	16,000	8,434	16,500	500	60,000	0	0
TECHNICAL SUPPORT					30,000	0	0
POSTAGES/FRANKING	500	0	500	0	0	20,000	30,000
ADVERTISING/MARKETING	1,000		4,000	3,000	500	500	500
OTHER SERVICES (Contingency 10%)	2,000		2,500	500	4,000	4,000	4,000
<b>Variable</b>	<b>22,000</b>	<b>8,569</b>	<b>27,500</b>	<b>5,500</b>	<b>108,350</b>	<b>31,350</b>	<b>42,350</b>
<b>Expenditure</b>	<b>286,336</b>	<b>123,017</b>	<b>257,565</b>	<b>-28,771</b>	<b>301,774</b>	<b>228,133</b>	<b>265,676</b>
INCOME-OTHER LOC AUTH(VAT)	-279,300	-279,300	-279,300	0	-279,300	-279,300	-279,300
SALES-PLANNING	-250	0	0	250	0	0	0
INCOME-INTEREST ON REV BALANCE	-1,000	0	-500	500	-500	-500	-500
<b>Income</b>	<b>-280,550</b>	<b>-279,300</b>	<b>-279,800</b>	<b>750</b>	<b>-279,800</b>	<b>-279,800</b>	<b>-279,800</b>
<b>Net</b>	<b>5,786</b>	<b>-156,283</b>	<b>-22,235</b>	<b>-28,021</b>	<b>21,974</b>	<b>-51,667</b>	<b>-14,124</b>
(TAKE FROM)/ADD TO RESERVES	-5,786		22,235	28,021	-21,974	51,667	14,124
<b>NET TOTAL</b>	<b>0</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Usable reserve balance</b>	-36,889		-64,910	-28,021	-42,936	-94,603	-108,727
<b>Usable reserve balance at 1/4/16</b>	-42,675						
<b>Usable reserve as % of expenditure</b>			-25.2%		-14.2%	-41.5%	-40.9%



SUBJ	DESCRIPTION	16/17 Budget	16/17 Forecast	16/17 Variance	17/18 Budget
610201	SINGLE STATUS BASIC PAY incl Agency	227,199	204,519	-22,680	160,931
614405	TRAINING COSTS	1,000	1,000	0	1,000
620305	RENTS PAYABLE, incl service charges	9,613	7,376	-2,237	7,487
630401	TRAVEL EXPENSES	5,100	4,200	-900	4,200
640805	IT HARDWARE	0	0	0	0
640810	IT SOFTWARE	16,000	11,000	-5,000	12,800
640815	IT MAINTENANCE	0	2,807	2,807	2,755
640830	MOBILE LINE RENTAL	524	100	-424	102
640701	PROFESSIONAL FEES	3,400	3,400	0	3,400
	EVENT COSTS	0	900	900	
641505	MISCELLANEOUS EXPENSES	1,500	1,500	0	1,500
	<b>Fixed</b>	<b>264,336</b>	<b>236,802</b>	<b>-27,534</b>	<b>194,175</b>
	<b>Technical Support</b>				
640605	PRINTING/PHOTOCOPYING COSTS	2,500	5,500	3,000	1,000
640702	CONSULTANT FEES	16,000	8,434	-7,566	90,000
640845	POSTAGES/FRANKING	500	500	0	500
641030	ADVERTISING/MARKETING	1,000	1,716	716	4,000
640707	OTHER SERVICES (Contingency 10%)	2,000	3,500	1,500	9,550
	<b>Variable</b>	<b>22,000</b>	<b>19,650</b>	<b>-2,350</b>	<b>105,050</b>
	<b>Expenditure</b>	<b>286,336</b>	<b>256,452</b>	<b>-29,884</b>	<b>299,225</b>
502001	INCOME-OTHER LOC AUTH(VAT)	-279,300	-279,300	0	-264,000
506001	SALES-PLANNING	-250	0	250	0
504002	INCOME-INTEREST ON REV BALANCE	-1,000	-200	800	-200
	<b>Income</b>	<b>-280,550</b>	<b>-279,500</b>	<b>1,050</b>	<b>-264,200</b>
	<b>Net</b>	<b>5,786</b>	<b>-23,048</b>	<b>-28,834</b>	<b>35,025</b>
90939	(TAKE FROM)/ADD TO RESERVES	-5,786	23,048	28,834	-35,025
	<b>NET TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	<b>Usable reserve balance</b>	<b>-36,889</b>	<b>-65,723</b>	<b>-28,834</b>	<b>-30,698</b>
	<b>Usable reserve balance at 1/4/16</b>	<b>-42,675</b>			
	<b>Usable reserve as % of expenditure</b>		<b>-25.6%</b>		<b>-10.3%</b>

From 2016/17 Sesplan could maintain a target of having at least one month's operating costs in reserves

**ITEM 10 – ANNUAL AUDIT PLAN 2016 / 2017**

Report by: Alice Miles, Acting SDP Manager

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**Purpose**

This Report presents SESplan's Annual Audit Plan for 2016 / 2017 for SESplan Joint Committee information. The Annual Audit Plan is attached as Appendix 1.

**Recommendations**

It is recommended that the SESplan Joint Committee:

- a) Notes the Annual Audit Plan as set out within Appendix 1.

**Financial Implications**

As set out below.

**Legal & Risk Implications**

All risks are detailed in the SESplan Risk Register and reported to Joint Committee on an annual basis.

**Policy & Impact Assessment**

No separate impact assessment is required.

**1. The Annual Audit**

- 1.1 The Accounts Commission is the public spending watchdog for local government, holding councils in Scotland to account and helping them to improve.

1.2 Authorities are expected to achieve the highest standards of governance and financial stewardship, and value for money in how they use their resources and provide their services. The Auditor General, the Accounts Commission and Audit Scotland work together to deliver public audit in Scotland:

- The Auditor General is an independent crown appointment, made on the recommendation of the Scottish Parliament, to audit the Scottish Government, NHS and other bodies and report to Parliament on their financial health and performance.
- The Accounts Commission is an independent public body appointed by Scottish ministers to hold local government to account. The Controller of Audit is an independent post established by statute, with powers to report directly to the Commission on the audit of local government.
- Audit Scotland is governed by a board, consisting of the Auditor General, the chair of the Accounts Commission, a non-executive board chair, and two non-executive members appointed by the Scottish Commission for Public Audit, a commission of the Scottish Parliament.

1.3 The Annual Audit plan attached as Appendix 1 to this Report contains an overview of the planned scope and timing of the annual audit, ensuring it is carried out in accordance with International Standards on Auditing (ISAs), the [Code of Audit Practice](#) and any other relevant guidance. The Plan identifies that Audit Scotland will provide an opinion on SESplan financial statements and related matters including an assessment of the appropriateness, effectiveness and impact of corporate governance, performance management arrangements and financial sustainability.

1.4 The SESplan Joint Committee is asked to note that Audit Scotland will now undertake the annual audit in accordance with the plan set out in Appendix 1.

## **2. Next Steps**

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2.1 The Local Authority Accounts (Scotland) Regulations 2014 state that best practice is for the Unaudited Accounts to be considered at Committee prior to the 30 June or no later than the 31 August each year. The Unaudited Accounts will therefore be brought to the June meeting of the SESplan Joint Committee for consideration.

- 2.2 Under the SESplan Constitution an Annual Report is required to be prepared on the work of the Joint Committee on or around the 31 August each year. Alongside the Annual Report and developed by the Heads of Planning Scotland and supported by Scottish Government the Planning Performance Framework (PPF) was introduced by planning authorities in 2012. The annual PPF Report is required to be submitted by the 31 July each year. Again, the Annual / PPF Report will be brought to the June meeting of the SESplan Joint Committee for consideration.
- 2.3 The Audited Accounts require to be considered by the Joint Committee by the 30 September each year with the Local Authority Accounts (Scotland) Regulations 1985 requiring that they are laid before a meeting of the authority within two months of receipt of the documents. The Audited Accounts and report of the Annual Audit for 2016 / 2017 will be brought to the September meeting of the Joint Committee.

## **Appendices**

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Appendix 1                      Annual Audit Plan 2016 / 2017

## **Report Contact**

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# Edinburgh and South East Scotland Strategic Development Planning Authority

Annual Audit Plan 2016/17

 AUDIT SCOTLAND

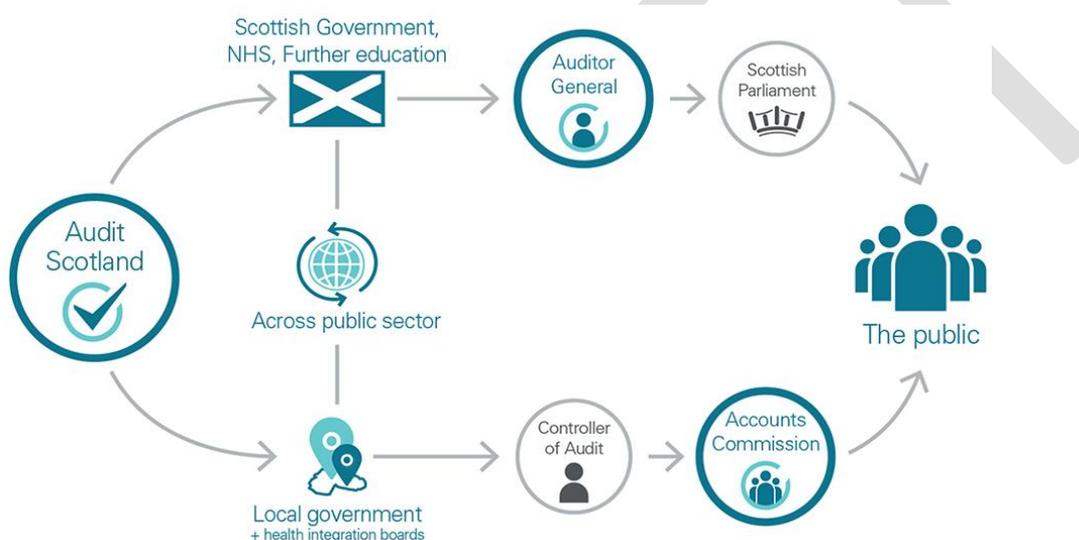
Prepared for Edinburgh and South East Scotland Strategic Development Planning Authority

February 2017

## Who we are

The Auditor General, the Accounts Commission and Audit Scotland work together to deliver public audit in Scotland:

- The Auditor General is an independent crown appointment, made on the recommendation of the Scottish Parliament, to audit the Scottish Government, NHS and other bodies and report to Parliament on their financial health and performance.
- The Accounts Commission is an independent public body appointed by Scottish ministers to hold local government to account. The Controller of Audit is an independent post established by statute, with powers to report directly to the Commission on the audit of local government.
- Audit Scotland is governed by a board, consisting of the Auditor General, the chair of the Accounts Commission, a non-executive board chair, and two non-executive members appointed by the Scottish Commission for Public Audit, a commission of the Scottish Parliament.



## About us

Our vision is to be a world-class audit organisation that improves the use of public money.

Through our work for the Auditor General and the Accounts Commission, we provide independent assurance to the people of Scotland that public money is spent properly and provides value. We aim to achieve this by:

- carrying out relevant and timely audits of the way the public sector manages and spends money
- reporting our findings and conclusions in public
- identifying risks, making clear and relevant recommendations.

# Contents

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<b>Risks and planned work</b>	<b>4</b>
Audit risks	4
Reporting arrangements	5
Audit fee	5
Responsibilities	6
<b>Audit scope and timing</b>	<b>7</b>
Financial statements	7
Internal audit	8
Audit dimensions	9
Independence and objectivity	10
Quality control	10

# Risks and planned work

1. This annual audit plan contains an overview of the planned scope and timing of our audit and is carried out in accordance with International Standards on Auditing (ISAs), the [Code of Audit Practice](#), and any other relevant guidance. This plan identifies our audit work to provide an opinion on the financial statements and related matters and meet the wider scope requirements of public sector audit. The wider scope of public audit contributes to conclusions on the appropriateness, effectiveness and impact of corporate governance, performance management arrangements and financial sustainability.

## Audit risks

2. Based on our discussions with staff and a review of supporting information we have identified the following main risk areas for Edinburgh and South East Scotland Strategic Development Planning Authority (SESplan). We have categorised these risks into financial risks and wider dimension risks. The key audit risks, which require specific audit testing, are detailed in [Exhibit 1](#).

## Exhibit 1

Audit Risk	Management assurance	Planned audit work
<b>Financial statement issues and risks</b>		
<p><b>1 Risk of management override of controls</b></p> <p>ISA 240 requires that audit work is planned to consider the risk of fraud, which is presumed to be a significant risk in any audit. This includes consideration of the risk of management override of controls in order to change the position disclosed in the financial statements.</p>	<ul style="list-style-type: none"> <li>Owing to the nature of this risk, assurances from management are not applicable in this instance.</li> </ul>	<ul style="list-style-type: none"> <li>Detailed testing of journal entries.</li> <li>Review of accounting estimates.</li> <li>Focused testing of accruals and prepayments.</li> <li>Evaluation of significant transactions that are outside the normal course of business.</li> </ul>
<p><b>2 Changes to key personnel and accounting requirements</b></p> <p>There have been a number of changes to key personnel during the year. This includes the retirement of the Manager (post vacant as at February 2017) and the accountant previously responsible for preparing the financial statements.</p> <p>As it will be new staff involved in the accounts process this year there is a risk that there will be omissions or errors which could impact on the completeness and accuracy of the financial statements.</p>	<ul style="list-style-type: none"> <li>An Acting SDP Manager was appointed in January 2017. Ongoing communication between the Acting SDP Manager and SESplan Accountant at Fife Council to ensure all expenditure is in accordance with the approved operating budget.</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing communication with finance staff to ensure they are aware of changes impacting on the 2016/17 accounts.</li> <li>Review of disclosure checklists.</li> <li>Review of account closedown procedures</li> <li>Detailed testing of transactions and year end balances above performance materiality.</li> </ul>

Audit Risk	Management assurance	Planned audit work
<b>Wider dimension risks</b>		
<p><b>3 User Access to Finance Systems</b></p> <p>The finance systems (Oracle ERP) used by SESplan are provided by Fife Council.</p> <p>The council's external auditor has highlighted a lack of regular user access review and scrutiny of user actions resulting in a risk of unauthorised transactions being processed. This is also a risk for SESplan.</p>	<ul style="list-style-type: none"> <li>Ongoing communication between the Acting SDP Manager and SESplan Accountant at Fife Council to ensure all expenditure is in accordance with the approved operating budget.</li> </ul>	<ul style="list-style-type: none"> <li>Detailed testing of transactions and balances above performance materiality.</li> </ul>

## Reporting arrangements

- 3.** Audit reporting is the visible output for the annual audit. All annual audit plans and the outputs as detailed in [Exhibit 2](#), and any other outputs on matters of public interest will be published on our website: [www.audit-scotland.gov.uk](http://www.audit-scotland.gov.uk).
- 4.** Matters arising from our audit will be reported on a timely basis and will include agreed action plans. Draft management reports will be issued to the relevant officer(s) to confirm factual accuracy.
- 5.** We will provide an independent auditor's report to SESplan and the Accounts Commission summarising the results of the audit of the financial statements. We will provide the SESplan and the Accounts Commission with an annual report on the audit containing observations and recommendations on significant matters which have arisen in the course of the audit.

## Exhibit 2

### 2016/17 Audit outputs

Audit Output	Target date	Joint Committee Date
Annual Audit Report including ISA 260 requirements	18 September 2017	25 September 2017
Signed Independent Auditor's Report	26 September 2017	N/A

## Audit fee

- 6.** The agreed audit fee for the 2016/17 audit of SESplan is £2,770. In determining the audit fee we have taken account of the risk exposure of SESplan, the planned management assurances in place and the level of reliance we plan to take from the work of internal audit. Our audit approach assumes receipt of the unaudited financial statements, with a complete working papers package by 30 June 2017.
- 7.** Where our audit cannot proceed as planned through, for example, late receipt of unaudited financial statements, a supplementary fee may be levied. An additional fee may also be required in relation to any work or other significant exercises outwith our planned audit activity.

## Responsibilities

### Joint Committee and Treasurer

**8.** Audited bodies have the primary responsibility for ensuring the proper financial stewardship of public funds, compliance with relevant legislation and establishing effective arrangements for governance, propriety and regularity that enable them to successfully deliver their objectives.

**9.** The audit of the financial statements does not relieve management or the Joint Committee, as those charged with governance, of their responsibilities.

### Appointed auditor

**10.** Our responsibilities as independent auditor are established by the 1973 Act for local government and the Code of Audit Practice, and guided by the auditing profession's ethical guidance.

**11.** Auditors in the public sector give an independent opinion on the financial statements. We also review and report on the arrangements within the audited body to manage its performance and use of resources. In doing this, we aim to support improvement and accountability.

# Audit scope and timing

## Financial statements

**12.** The statutory financial statements audit will be the foundation and source for the majority of the audit work necessary to support our judgements and conclusions. We also consider the wider environment and challenges facing the public sector. Our audit approach includes:

- understanding the business of SESplan and the associated risks which could impact on the financial statements
- assessing the key systems of internal control, and establishing how weaknesses in these systems could impact on the financial statements
- identifying major transaction streams, balances and areas of estimation and understanding how SESplan will include these in the financial statements
- assessing the risks of material misstatement in the financial statements
- determining the nature, timing and extent of audit procedures necessary to provide us with sufficient audit evidence as to whether the financial statements are free of material misstatement.

**13.** We will give an opinion on the financial statements as to:

- give a true and fair view in accordance with applicable law and the Code of practice on local authority accounting in the UK 2016-17 (the Code) of the state of affairs of SESplan and of its income and expenditure for the year
- have been properly prepared in accordance with IFRSs as adopted by the European Union, as interpreted and adapted by the Code
- have been prepared in accordance with the requirements of the Local Government (Scotland) Act 1973, The Local Authority Accounts (Scotland) Regulations 2014, and the Local Government in Scotland Act 2003.

## Materiality

**14.** Materiality defines the maximum error that we are prepared to accept and still conclude that that our audit objective has been achieved. It helps assist our planning of the audit and allows us to assess the impact of any audit adjustments on the financial statements. We calculate materiality at different levels as described below. The calculated materiality values for SESplan are set out in [Exhibit 3](#).



## Exhibit 3

### Materiality values

Materiality level	Amount
<b>Planning materiality</b> - This is the calculated figure we use in assessing the overall impact of audit adjustments on the financial statements. It has been set at 1% of the budgeted gross expenditure as at November 2016 for the year ended 31 March 2017	£2,575
<b>Performance materiality</b> - This acts as a trigger point. If the aggregate of errors identified during the financial statements audit exceeds performance materiality this would indicate that further audit procedures should be considered. Using our professional judgement we have calculated performance materiality at 60% of planning materiality.	£1,545
<b>Reporting threshold</b> - We are required to report to those charged with governance on all unadjusted misstatements in excess of the 'reporting threshold' amount. This has been calculated at 4% of planning materiality.	£100

15. We review and report on other information published with the financial statements including the management commentary, annual governance report and the remuneration report. Any issue identified will be reported to the SESplan Joint Committee.

### Timetable

16. To support the efficient use of resources it is critical that a financial statements timetable is agreed with us for the production of the unaudited accounts. An agreed timetable is included at [Exhibit 4](#) which takes account of submission requirements and planned Joint Committee dates:

## Exhibit 4

### Financial statements timetable

 Key stage	 Date
Consideration of unaudited financial statements by those charged with governance	26 June 2017
Latest submission date of unaudited financial statements with complete working papers package	30 June 2017
Latest date for final clearance meeting with the accountant	25 August 2017
Agreement of audited unsigned financial statements; Issue of Annual Audit Report including ISA 260 report to those charged with governance	18 September 2017
Independent auditor's report signed	26 September 2017

### Internal audit

17. Auditing standards require internal and external auditors to work closely together to make best use of available audit resources. Internal audit is provided by Fife Council's Audit and Risk Management Service (ARMS). We seek to rely on the work of internal audit wherever possible; however there are no planned internal audit reviews for SESplan this year.

## Audit dimensions

18. Our audit is based on four audit dimensions that frame the wider scope of public sector audit requirements as shown in [Exhibit 5](#).

### Exhibit 5

#### Audit dimensions



#### Financial sustainability

19. As auditors we consider the appropriateness of the use of the going concern basis of accounting as part of the annual audit. We will also comment on SESplan's financial sustainability in the longer term. We define this as medium term (two to five years) and longer term (longer than five years) sustainability. We will carry out work and conclude on :

- the effectiveness of financial planning in identifying and addressing risks to financial sustainability in the short, medium and long term
- whether SESplan can demonstrate the affordability and effectiveness of funding.

#### Financial management

20. Financial management is concerned with financial capacity, sound budgetary processes and whether the control environment and internal controls are operating effectively. We will review, conclude and report on:

- whether arrangements are in place to ensure systems of internal control are operating effectively
- whether SESplan can demonstrate the effectiveness of budgetary control systems in communicating accurate and timely financial performance
- how SESplan has assured itself that its financial capacity and skills are appropriate
- whether appropriate and effective arrangements for the prevention and detection of fraud and corruption have been established.

## Governance and transparency

**21.** Governance and transparency is concerned with the effectiveness of scrutiny and governance arrangements, leadership and decision-making and transparent reporting of financial and performance information. We will review, conclude and report on:

- whether SESplan can demonstrate that the governance arrangements in place are appropriate and operating effectively.
- whether there is effective scrutiny, challenge and transparency on the decision-making and finance and performance reports.
- the quality and timeliness of financial and performance reporting.

## Value for money

**22.** Value for money refers to using resources effectively and continually improving services. We will review, conclude and report on whether SESplan can provide evidence that it is demonstrating value for money in the use of its resources, has a focus on improvement and that there is a clear link to the outcomes delivered.

## Independence and objectivity

**23.** Auditors appointed by Audit Scotland must comply with the Code of Audit Practice. When auditing the financial statements auditors must also comply with professional standards issued by the Financial Reporting Council and those of the professional accountancy bodies. These standards impose stringent rules to ensure the independence and objectivity of auditors. Audit Scotland has in place robust arrangements to ensure compliance with these standards including an annual “fit and proper” declaration for all members of staff. The arrangements are overseen by the Assistant Auditor General, who serves as Audit Scotland’s Ethics Partner.

**24.** The engagement lead for SESplan is Pearl Tate, Senior Audit Manager. Auditing and ethical standards require the appointed auditor to communicate any relationships that may affect the independence and objectivity of audit staff. We are not aware of any such relationships pertaining to the audit of SESplan.

## Quality control

**25.** International Standard on Quality Control (UK and Ireland) 1 (ISQC1) requires that a system of quality control is established, as part of financial audit procedures, to provide reasonable assurance that professional standards and regulatory and legal requirements are being complied with and that the independent auditor’s report or opinion is appropriate in the circumstances.

**26.** The foundation of our quality framework is our Audit Guide, which incorporates the application of professional auditing, quality and ethical standards and the Code of Audit Practice issued by Audit Scotland and approved by the Auditor General for Scotland. To ensure that we achieve the required quality standards Audit Scotland conducts peer reviews, internal quality reviews and is currently reviewing the arrangements for external quality reviews.

**27.** As part of our commitment to quality and continuous improvement, Audit Scotland will periodically seek your views on the quality of our service provision. We welcome feedback at any time and this may be directed to the engagement lead.

# Edinburgh and South East Scotland Strategic Development Planning Authority

## Annual Audit Plan 2016/17

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