

Issue 2.1	The Spatial Strategy			
Development Plan reference:	The Spatial Strategy (pages 12 – 14, paragraphs 3.1 – 3.9)	Reporter: [Note: For DPEA use only.]		
Body or person(s) submitting a representation raising the issue (including reference number):				
<table border="0" style="width: 100%;"> <tr> <td style="vertical-align: top; width: 50%;"> <p>Aithrie Estates (032643) Ashfield Land (038483) Barratt and David Wilson Homes (799597) Builyeon Farms LLP (835897) CALA Management Ltd (929806) A J C Clark (930956) Cockburn Association (037249) Corstorphine Community Council (040457) Cramond and Barnton Community Council (803443) W S Crawford (040107) Edinburgh Association of Community Councils (040476) Friends of the River Almond Walkway (925870) Grange and Prestonfield Community Council (790304) Mr Jon Grounell (786916) Gullane Area Community Council (037068) H and H Group Plc (927998) Hallam Land Management Ltd (039805) Hargreaves UK Services Ltd (038489) Homes for Scotland (040551) Juniper Green Community Council (028859) Lammermuir Community Council (039856) Lawfield Estate (930075) Liberton and District Community Council (790396)</p> </td> <td style="vertical-align: top; width: 50%;"> <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) Transform Scotland (039136) Trinity Community Council (039995) Wallace Land and Investment (930071) Wemyss and March Estate / Socially Conscious Capital (037270)</p> </td> </tr> </table>			<p>Aithrie Estates (032643) Ashfield Land (038483) Barratt and David Wilson Homes (799597) Builyeon Farms LLP (835897) CALA Management Ltd (929806) A J C Clark (930956) Cockburn Association (037249) Corstorphine Community Council (040457) Cramond and Barnton Community Council (803443) W S Crawford (040107) Edinburgh Association of Community Councils (040476) Friends of the River Almond Walkway (925870) Grange and Prestonfield Community Council (790304) Mr Jon Grounell (786916) Gullane Area Community Council (037068) H and H Group Plc (927998) Hallam Land Management Ltd (039805) Hargreaves UK Services Ltd (038489) 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) Transform Scotland (039136) Trinity Community Council (039995) Wallace Land and Investment (930071) Wemyss and March Estate / Socially Conscious Capital (037270)</p>
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Provision of the Development Plan to which the issue relates:	The Spatial Strategy for the region.			

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

Aithrie Estates (032643)

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 (038483)

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 (799597)

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 Farms LLP (835897)

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 (929806)

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 (930956)

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 (037249)

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 (040457)

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 (803443), Friends of the River Almond Walkway (925870)

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.

W S Crawford (040107)

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 (040476), Grange and Prestonfield Community Council (790304)

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 Grounsell (786916)

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 (037068)

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 (927998)

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 (039805)

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

Hargreaves UK Services Ltd (038489)

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 (040551)

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 (028859)

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 (039856)

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 (930075)

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 (790396)

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 (040611)

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 (928549)

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 (778339)

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 (906008)

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 (927996)

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 (034296)

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 (840024)

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 (039990)

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 (039835)

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 (035887)

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 (040552)

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 (790524)

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 (039402)

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 (790577)

Objects to existing Figure 3.1 Key Diagram and Figure 3.3 Edinburgh and West on grounds of flood risk.

Scottish Natural Heritage (790587)

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).

Shawfair LLP (039940)

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 (038954)

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 (805601)

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 (034701)

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

Transform Scotland (039136)

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 (039995)

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 (930071)

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 and March Estate / Socially Conscious Capital (037270)

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 (032643)

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

Ashfield Land (038483)

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 (799597)

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 (929806)

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 (037249)

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 (803443), Friends of the River Almond Walkway (925870)

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.

W S Crawford (040107)

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 (040476)

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

Gullane Area Community Council (037068)

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 (927998)

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

Hargreaves UK Services Ltd (038489)

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 (040551)

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 (028859)

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

Lawfield Estate (930075)

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

Musselburgh Conservation Society (927996)

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 (840024)

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 (039835)

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 (040552)

Modify Figure 3.1 Key Diagram 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 (790524)

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 (039402)

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

Scottish Environment Protection Agency (790577)

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 (034701)

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 (930071)

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 (040476), Grange and Prestonfield Community Council (790304), Mr Jon Grounsell (786916), Gullane Area Community Council (037068), Hargreaves UK Services Ltd (038489), Homes for Scotland (040551), Lammermuir Community Council (039856), Liberton and District Community Council (790396), D and L McAuslan (040611), Moorfoot Community Council (906008), Mrs Constance Newbould (034296), Mrs Gail Reid (035887), Crawford and Douglas Ritchie (040552), Roslin and Bilston Community Council (790524), South West Communities Forum (805601), Transform Scotland (039136)

The Proposed Plan strategy has been developed from the options consulted upon at Main Issues Report stage. This is based on the preferred option (ASD12). The evidence for the proposed plan spatial strategy was considered at Main Issues Report stage and Spatial Strategy Technical Note (ASD37) and the Housing Land Technical Note (ASD58). Chapter 11 of the Proposed Plan Housing Land Background Paper (ASD22) 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 Proposed Plan Vision and Scottish Planning Policy (SPP) paragraphs 26 to 29 and 40 (ASD06).

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 (035887)

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 (778339)

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 (ASD20).

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 (039835), Wemyss and March Estate / Socially Conscious Capital (037270)

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 (040551), Crawford and Douglas Ritchie (040552)

Figure 3.1 provides clarity on the focus of strategic growth within the largest settlements and Figure 5.1 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.**

W S Crawford (040107)

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 (039995)

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. Green networks are intended to enhance development, not prohibit it. **No modifications proposed.**

Wallace Land and Investment (930071)

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's spatial strategy was considered at Main Issues Report stage and within the Spatial Strategy Technical Note (ASD37) and Housing Land Technical Note (ASD58). 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 (ASD06).

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 (032643)

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 (ASD06). 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 being carried out and the requisite public engagement having taken place at the LDP stage. **No modifications proposed.**

Barratt and David Wilson Homes (799597)

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 (927996)

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 (039402)

There is one single housing market area covering the whole of the SESplan area. Tables 5.1 and 5.2 sets 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 (930956), Juniper Green Community Council (028859)

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 (ASD06).

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 (037249)

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 and Barnton Community Council (803443), Friends of the River Almond Walkway (925870)

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 Farms LLP (835897), Corstorphine Community Council (040457), Gullane Area Community Council (037068), H and H Group Plc (927998), Mrs Mirabelle Maslin (928549), NHS Lothian Public Health and Health Policy (840024), Shepherd Offshore (Scotland) Ltd (038954)

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 (ASD50) and the SEStran Regional Transport Strategy (ASD69). 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 (034701)

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 (790587)

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 (ASD06). 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 (039940)

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 (790577)

The Proposed Plan has been informed by the Strategic Flood Risk Assessment (SFRA), October 2016 (ASD01). An Addendum to the SFRA has also been prepared (ASD53) 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 (ASD70).

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 (ASD06) 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 (ASD01 and ASD53) provide appropriate clarity and direction to LDPs in order to minimise flood risk. **No modifications proposed.**

Specific Sites and Areas

CALA Management Ltd (929806)

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 (ASD06) 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 (ASD06) 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 (ASD06). **No modifications proposed.**

Ashfield Land (038483), Hallam Land Management Ltd (039805), Lawfield Estate (930075), Park Lane (Scotland) Ltd (039990)

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 (037249)

The spread of growth across Scotland is a matter for National Planning Framework (NPF). NPF3 (ASD40) makes clear that South East Scotland, as home to Scotland's second largest city, is a major location for growth. Similarly the second robust and credible housing need and demand assessment (ASD23), 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 (ASD20) and Habitats Regulations Appraisal (ASD52). 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 (e.g. 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 (ASD06). 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.]