

<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:</b> [Note: For DPEA use only.]
<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)  Taylor Wimpey and Hallam Land (039521)  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 (038483)</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 (799597)

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 (037249)

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 (039328), Mrs Constance Newbould (034296)

Glencorse Barracks site could be used for housing.

Edinburgh Association of Community Councils (040476)

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 (037370)

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 (929573)

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 (790304)

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 (803807)

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 (038881), Hargreaves UK Services Ltd (038489)

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 (034243)

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 (790396)

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 (038949)

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 (928549)

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

Midlothian Green Party (778339)

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 (040241)

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 (927996)

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 (034699)

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 (035522)

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 (040312)

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 (040552)

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 (790523)

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

Savills (793820)

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 (038549)

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 (034698)

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 (038853)

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 (790577)

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

Shawfair LLP (039940)

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 (038954)

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 (024823)

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 (930050)

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”.

Taylor Wimpey and Hallam Land (039521)

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.

Wallace Land Investment and Management (930071)

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 (851948)

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 (037270)

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 (038483)

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 (799597)

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

Cockburn Association (037249)

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 (040476)

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

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 (037370)

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 (929573)

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 (803807)

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 (038489)

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 (790396)

Remove reference to BioQuarter at paragraph 3.16.

Mactaggart and Mickel Homes (038949)

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 (040241)

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

Neart na Gaoithe Offshore Wind Ltd (034699)

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 (035522)

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 (040312)

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 (040552)

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 (793820)

Identify the land surrounding the existing employment areas at Fenton Barns, (as shown within Fenton Barns Development Framework Report November 2016, Savills RSD19), as an area for Strategic Growth in the period 2018-2030 on Figure



3.2.

Scottish Power Generation (034698)

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 Cnockenzie 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 (038853)

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 RSD20). At the very least the area should be extended to include the Drum Estate.

Scottish Environment Protection Agency (790577)

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 (039940)

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 (038954)

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

Wallace Land Investment and Management (930071)

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 (040552), SEEDCo (038853), Savills (793820), Wallace Land Investment and Management (930071)

SESplan disagree that the Proposed Plan should specify priority areas for strategic growth beyond 2030. As required by Scottish Planning Policy (SPP) paragraph 118 (ASD06), 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 (ASD22), 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 (ASD06).

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. 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 (ASD71) are out of date. The MIR Spatial Strategy Technical note contained an analysis of environmental and infrastructure constraints and capacities by Housing Market Area (ASD37).

In compliance with SPP paragraph 118 (ASD06), 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 (799597), Wallace Land Investment and Management (930071)

SESplan disagree that the Proposed 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 (ASD06) 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 (039940)

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 (039328), Highland Residential Developments (034243), Mrs Constance Newbould (034296), Taylor Wimpey and Hallam Land (039521)

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

Scottish Wildlife Trust (038549)

The Environmental Report, SESplan October 2016 (ASD20) 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 (038483), Hargreaves Services (038881), Hargreaves UK Services Ltd (038489)

SESplan disagrees that there is a need for the Proposed 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 (037249)

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 (038949)

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 (035522)

SESplan disagrees that the Proposed 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 Proposed 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 Proposed 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 (851948)

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 3.1 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 Proposed 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 (790577)

The SESplan Strategic Flood Risk Assessment, October 2016 (ASD01) 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 (ASD53). A large part of the south east has been identified within the Forth Estuary Management Strategy as a Potentially Vulnerable Area for flood risk (ASD70). The SESplan Strategic Flood Risk Assessment Addendum sets out the main areas of risk and refers to actions contained in the Forth Estuary Management Strategy and the Local Flood Risk Management Plan undertaken by the City of Edinburgh Council to support the Local Plan (ASD72). The Management Strategy and 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 and Addendum (ASD01 and ASD53) identify 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 (024823)

Paragraph 2.5 of the SESplan Strategic Flood Risk Assessment, October 2016 (ASD01) 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 (ASD53). 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 (ASD72). 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 (778339)

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 (ASD50) 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 (040241)

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 (037270)

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 (930050)

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 (037249)

SESplan disagrees that the Proposed 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 (ASD40). It is considered that the Proposed Plan text at paragraph 3.16 reflects this designation. **No modifications proposed.**

#### Forth Ports Ltd (929573)

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 (ASD40). 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 (034699)

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 (ASD40). 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 (034698)

The National Planning Framework paragraph 3.41 identifies Cockenzie as an area of co-ordinated action (ASD40). 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 (790396)

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 (ASD40). The Edinburgh LDP, November 2016 (ASD73) 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 Supplementary Guidance Edinburgh BioQuarter and South East Wedge Parkland, the City of Edinburgh Council, December 2013 (ASD74), which once adopted will form part of the development plan. The text at paragraph 3.16 of the Proposed Plan is consistent with 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 (037370)

SESplan disagree that it is necessary for the Proposed 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 within the South East. It identifies an Innovation and Science cluster at the BioQuarter. The location of this cluster on Figure is considered accurate. **No modifications proposed.**

## **Economy**

### Haddington and District Amenity Society (803807)

SESplan disagrees that there is a need for modification to ensure the Proposed 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. The SESplan Assets on pages 4 and 5 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 Proposed 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 (803807)

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 Proposed 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 (040476)

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 (040312)

SESplan disagrees that the Proposed 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 (037249)

SESplan disagrees that the Proposed 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 (ASD75). It has been identified through the transport appraisal accompanying the Proposed LDP. **No modifications proposed.**

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

SESplan disagrees that the Proposed 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 (038949), Shepherd Offshore (Scotland) Ltd (038954)

As set out in paragraph 6.9, a range of transport infrastructure is needed to support the Vision of the Proposed 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 (790523)

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 (930071)

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.]