

Issue 4	Investment and Employment	
Development Plan reference:	Pages 30-35, Paragraphs 4.1-4.15, Table 4.1, Figure 4.1.	Reporter: [Note: For DPEA use only.]
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mr George Adam (037603) Cockburn Association (037249) Cramond and Barnton Community Council (803443) The Crown Estate (Scotland Portfolio) (039431) Denholm and District Community Council (040612) EDF Energy (040462) Edinburgh Association of Community Councils (040476) Edinburgh BioQuarter Partners (037370) Eyemouth Harbour Trust (031900) Forth Ports Ltd (929573) Grange and Prestonfield Community Council (790304) Gullane Area Community Council (037068) Haddington and District Amenity Society (803807) Hallam Land Management Ltd (039805) Hargreaves Services (038881) Kelso Community Council (039365) Lammermuir Community Council (039856) Liberton and District Community Council (790396) Linlithgow and Linlithgow Bridge Community Council (930033) Mrs Mirabelle Maslin (928549) National Trust for Scotland (040626)</p>	<p>Near na Gaoithe Offshore Wind Ltd (034699) New Ingliston Ltd (929755) North Berwick Community Council (035522) Park Lane (Scotland) Ltd (039990) Peebles Community Trust (810911) Peebles and District Community Council (039578) Prestonpans Community Council (039835) Queen Margaret University (040312) Roslin and Bilston Community Council (790524) RSPB Scotland (031480) Scarborough Muir Group Ltd (929314) Scottish Government (034404) Scottish Natural Heritage (790587) ScottishPower Generation (034698) Scottish Property Federation (037013) Scottish Wildlife Trust (038549) Shawfair LLP (039940) Shepherd Offshore (Scotland) Ltd (038954) Mr Julian Siann (024823) Mr Charles Strang (907037) Taylor Wimpey/Hallam Land (039521) VisitScotland (029385) Wallace Land Investment and Management (930071)</p>	
Provision of the Development Plan to which the issue relates:	Locations for investment including significant business clusters and employment land supply.	
Planning Authority's summary of the representation(s):		
<p><u>Mr George Adam (037603)</u> Public transport does not serve Linlithgow to West Lothian employment clusters.</p>		

Employment land at Linlithgow lacks access from M9 junction 3.

Cockburn Association (037249)

Consider clusters aspirational and should be monitored so as to not prevent other development such as housing. Clusters should promote conservation and enhancement of areas. Clusters should allow for housing and ensure that allocation of employment land does not prevent brownfield sites being developed for housing as this will have greater benefits to Edinburgh.

Large employment sites must be based on the Placemaking Principles and green belt and greenfield sites such as farmland avoided

Cramond and Barnton Community Council (803443)

Proposed Plan does not consider digital economy and increases in home, remote and flexible working. This could reduce commuting and emissions and increase quality of life.

The Crown Estate (Scotland Portfolio) (039431)

Support innovation and science cluster. Land in vicinity of Easter Bush and Bush Estate could accommodate residential development in support of the cluster and include green network linkages.

Denholm and District Community Council (040612)

Plan does not consider sufficient locations for investment identified in Figure 3.5 Scottish Borders.

EDF Energy (040462)

Support reference to Torness in Table 4.1 but do not see development occurring over longer plan period. Torness working life may be extended beyond 2030 then decommissioning will continue to contribute to economy of region.

Edinburgh Association of Community Councils (040476)

Investment should be directed to coexist with housing to reduce commuting, increase sustainability and placemaking. Proposed Plan should reference changes in working patterns.

Plan must be responsive to economic and market changes.

Edinburgh BioQuarter Partners (037370)

Paragraph 4.1 should refer to Edinburgh City Region's potential to boost Scotland's competitiveness. Appears reluctance to refer to Edinburgh as key driver of economic growth in region and in Scotland.

Broadly support business clusters but consider a tiered prioritisation approach should be used as per SESplan Main Issues Report. This is to allow resources to be allocated between each cluster and between sites within clusters. Priority should be given to Edinburgh BioQuarter within the clusters.

Eyemouth Harbour Trust (031900)

Eyemouth Harbour should be included in Forth Coast Cluster as it has potential to

host marine energy related activities including offshore wind operations and maintenance. Cluster is noted in Scottish Development International and Scottish Enterprise research (RSD03). Coastal assets, specifically the port at Eyemouth will need to evolve to meet requirements of marine energy sector.

Forth Ports Ltd (929573)

Not all sites in Forth Coast Cluster suitable for port development and cluster does not recognise full potential of sites for development. It is not clear where energy or port uses are appropriate. Not a cohesive cluster. Does not represent an Area of Coordinated Action.

The Ports of Methil and Kirkcaldy should be identified as Forth Coast Cluster locations.

Grange and Prestonfield Community Council (790304)

Plan must be responsive to economic and market changes.

Gullane Area Community Council (037068)

Lack of business clusters at North Berwick and Haddington suggests that these areas are unsustainable for growth as indicated in the Proposed Plan Spatial Strategy.

Haddington and District Amenity Society (803807)

Consider that there are no significant employment opportunities identified in East Lothian beyond Musselburgh and that potential work locations in the Forth Clusters need to be complemented by housing and infrastructure.

Hallam Land Management Ltd (039805)

Craigiehall not included in West Edinburgh Business Cluster.

In terms of Employment Land 4.13 - 4.15 part of the Craigiehall site has an established use. There is also a commitment that LDP will support '*diversification and re-categorisation of existing employment sites where this facilitates wider business opportunities mixed use or an increased density of development.*'

Hargreaves Services (038881)

Seeks that the Westfield Surface Mine be identified in Proposed Plan as a Significant Business Cluster.

Kelso Community Council (039365)

Does not support policy as significant business clusters do not include Kelso.

Lammermuir Community Council (039856)

Would like to see smaller business clusters promoted in the Central Borders.

Liberton and District Community Council (790396)

Supporting Infrastructure, including transport and education, should be in place to ensure local people benefit from the Bush.

Proposed Plan should mention tourism, particularly in relation to Rosslyn Chapel,

and ensure the area's character is not destroyed by development.

The Plan needs to do more to facilitate employment opportunities if it genuinely seeks to reduce travel especially by car.

Paragraph 4.15 should emphasise retaining employment land and resisting other uses such as housing. Paragraphs 4.13-4.15 fail to promote improving existing public transport services to employment sites.

Linlithgow and Linlithgow Bridge Community Council (930033)

Support significant business clusters but disappointed north West Lothian, such as Linlithgow, is not included. Linlithgow has tourism interest and empty office and retail space. Modification to junction 3 of M9 could make economic development more viable.

Mrs Mirabelle Maslin (928549)

Questions how paragraphs 4.5 and 4.6 can be delivered with reduced local authority resources and lack of monitoring and enforcement of the current Strategic Development Plan. Considers road and other infrastructure is inadequate to deal with the significant business clusters in table 4.1.

National Trust for Scotland (040626)

The focus on Edinburgh as the source of employment is likely to see existing pinchpoints for commuting become still more congested.

Neart na Gaoithe Offshore Wind Ltd (034699)

Table 4.1 fails to take account of National Planning Framework 3, specifically the Area of Coordinated Action between Cockenzie and Torness.

New Ingliston Ltd (929755)

West Edinburgh Business Cluster should include reference to housing. This is to align to wider spatial strategy and to be clear to investors about wider opportunities.

Proposed Plan should direct Local Development Plans to ensure International Business Gateway (IBG) site is not compromised by singular employment land allocation.

North Berwick Community Council (035522)

East Lothian Proposed Local Development Plan does not identify sufficient employment land in North Berwick. There is pressure for existing employment land from housing. Land and property which is underused could be categorised for employment.

Park Lane (Scotland) Ltd (039990)

West Edinburgh Business Cluster should include Ratho.

Peebles Community Trust (810911)

Support local business clusters but the importance of these in supporting sustainable rural communities is under represented.

Peebles and District Community Council (039578)

Strategy fails to identify sufficient opportunities for rural employment.

Prestonpans Community Council (039835)

Support inclusion of Cockenzie but note major investment in transport infrastructure is needed to support development.

Queen Margaret University (040312)

Support clustering of businesses. Consider inclusion of land adjacent to Queen Margaret University.

Roslin and Bilston Community Council (790524)

Local Authorities need to ensure the alignment of employment uses with housing and infrastructure, including sustainable travel networks and ensure infrastructure is in place before development takes place.

Support inclusion of The Bush, but needs support in education, transport and other areas so that local people can benefit. Consider widening and improving the road from Gowkley Moss to The Bush together with the possibility of connecting with the proposed A702 link or another improved local road.

Tourism industry is important in (Midlothian) area and if character is destroyed this will be lost.

RSPB Scotland (031480)

The Proposed Plan should ensure significant business clusters do not impact on any adjacent protected areas and wildlife. Support sustainable travel to clusters.

Scarborough Muir Group Ltd (929314)

Support inclusion of Rosyth harbour in Forth Coast Cluster but description should be amended to include reference to a major mixed use area supporting the majority of use classes including housing. This is due to the sites accessible location, existing investment in infrastructure and remediation work, community support and planning history (submitted as background document). Port use has not proven attractive despite investment and marketing and there is an oversupply of employment land in Fife.

Scottish Government (034404)

Proposed Plan should better reflect paragraph 98 in respect of Strategic Centres this would also address paragraphs 95 and 96 in Scottish Planning Policy and pages 12 and 13 in the National Planning Framework.

Should state support for home working and energy efficiency.

Must address paragraph 103 of Scottish Planning Policy regarding issues around take up of employment sites and the need to consider a wider range of uses or alternatives on sites that no longer meet current needs and market expectations.

Scottish Natural Heritage (790587)

Supports section of Proposed Plan. Consideration should be given to landing sites,

grid connections and infrastructure associated with offshore wind farms. Should give a spatial direction for offshore wind developers in advance of a regional marine plan.

Scottish Power Generation (034698)

Reference to significant business clusters confusing and should be reconsidered. Should refer to National Planning Framework terms including Areas of Coordinated Action (Cockenzie to Torness) and other general direction in National Planning Framework. Relationship between clusters and Areas of Coordinated Action unclear.

Reference should be made to the potential for revised National Planning Framework policy to encourage employment-led regeneration of former national development sites such as Cockenzie, Longannet and former Kincardine Power Stations. Does not take account of current National Planning Framework regarding wider opportunities for Cockenzie.

Scottish Property Federation (037013)

Shortage of Grade A office space in city centre, lack of low cost office space in central Edinburgh and office space in wider region is not addressed in Proposed Plan. This is vital to attracting businesses and growth.

Scottish Wildlife Trust (038549)

A high quality environment attracts entrepreneurial talent – this should be highlighted.

Shawfair LLP (039940)

Support inclusion of Shawfair in Borders Rail Cluster. Consideration should be given to impacts for housing land supply in the surrounding area.

Shepherd Offshore (Scotland) Ltd (038954)

Asks that Local Authorities ensure records of land supply are up to date.

Mr Julian Siann (024823)

Local employment sites, such as small workshops, offices, corner shops, are being reduced as a result of new housing.

Mr Charles Strang (907037)

Emphasise high quality environment and National Scenic Area in Borders Rail Cluster.

Taylor Wimpey/Hallam Land (039521)

Support this section of the Proposed Plan. Consider it important to align new housing and infrastructure with all clusters. In particular at the Bush / A701 and site HS16 and extension in Midlothian Council's Proposed Local Development Plan.

VisitScotland (029385)

Considers that there is an opportunity for growth around tourism in Leith and a tram extension would be a key factor.

Wallace Land Investment and Management (930071)

Plan fails to identify the importance of the tourism economy as a major element of

the regional economy.

The City Region Deal is considered to have a material impact on economic growth within the City Region and SDP2 should await the approval of a City Region Deal, in order that the plan can take the City Region Deal more fully into account.

Modifications sought by those submitting representations:

Cockburn Association (037249)

Add 'support the inclusion of housing within business clusters, where this is appropriate and feasible' to paragraph 4.2. Include the option of compulsory purchase of brownfield land to facilitate the building of affordable housing in paragraph 4.2.

In paragraph 4.13 include a statement that large scale employment sites must be selected based on relevant criteria in the Placemaking Principles and that priority for the selection of employment land should be brownfield sites, preferably within / close to settlements. In paragraph 4.14 include a statement on the management of safeguarded land.

Cramond and Barnton Community Council (803443)

Proposed Plan should promote flexible working and encourage new homes to provide for home working.

Edinburgh Association of Community Councils (040476)

Include reference to employment and housing located together.

Include reference to changes in working patterns.

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

Paragraph 4.15 add: Where it is likely that existing employment sites will not be used for other business purposes or housing, opportunities for parkland or open space uses including food production must be explored to avoid blight.

Edinburgh BioQuarter Partners (037370)

There should be a tiered approach to clusters. Priority should be given to Edinburgh BioQuarter within the clusters.

Eyemouth Harbour Trust (031900)

Include Eyemouth Harbour in Forth Coast Cluster and add to Figure 4.1. Under Opportunities add "Operations and maintenance for marine energy assets at ports including Eyemouth".

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

Forth Ports Ltd (929573)

Identify ports at Methil and Kirkcaldy as locations within the Forth Coast Cluster.

Principle sectors should be identified as 'Energy and Port Related Use.'

Opportunities should be amended to state as follows: 'Cluster of coastal sites providing opportunities for a range of uses, the range of which is dependent upon their physical characteristics. Port use such as renewables manufacture and servicing, thermal and low carbon energy generation or other uses associated with the Cockenzie Area of Coordinated Action are identified within the Cluster. These locations also present significant opportunities for innovative reuse and regeneration, making use of the well serviced sites and their coastal locations. Subject to a review of the National Planning Framework, locations at the former Longannet and Cockenzie power station sites may have potential for a wider range of uses. The Ports of Methil, Kirkcaldy, Burntisland, Rosyth and Leith are operational multi-purpose ports and provide opportunities for a broad range of industrial and port related uses including energy related manufacture and supporting energy related operations.'

Amend Table 4.1 and Figure 4.1 to indicate opportunities in relation to locations identified.

Hargreaves Services (038881)

Seeks that the Westfield Surface Mine be identified in Proposed Plan as a Significant Business Cluster (figure 4.1, Significant Business Clusters, page 31).

Lammermuir Community Council (039856)

Inclusion of smaller business clusters promoted in the Central Borders.

Liberton and District Community Council (790396)

Including provision of supporting infrastructure at the Bush. Include reference to tourism, including Rosslyn Chapel and protecting the area's character.

Paragraph 4.15 should emphasise retaining employment land and resisting other uses such as housing. Modification not specified, assumed paragraphs 4.13 - 4.15 should include reference to improving public transport to employment sites.

Neart na Gaoithe Offshore Wind Ltd (034699)

Amend table 4.1 to include 'Area of Coordinated Action for East Lothian'.

Comprising: Onshore infrastructure (cables and substations) for major offshore wind farm developments including Neart na Gaoithe (plus other elements in NPF3).

Principle Sectors: to include renewable energy. Opportunities: 'Significant plans for offshore wind to the east of the Firths of Forth and Tay, with planning permissions having been granted by East Lothian Council for grid connections for these developments. Afforded national development status within NPF3, East Lothian Council should continue in its support of such developments, safeguarding routes from conflicting developments which might jeopardise delivery.'

New Ingliston Ltd (929755)

Include specific reference to mixed uses including conference facilities, tourism and residential development under West Edinburgh Business Cluster.

Proposed Plan should direct Local Development Plans to ensure IBG site is not compromised by singular employment land allocation.

North Berwick Community Council (035522)

Strengthen protection of employment land particularly in and around North Berwick. Land and property which is under used could be categorised for employment.

Peebles Community Trust (810911)

Add symbols representing main rural settlements to indicate importance (Figure 4.1).

Peebles and District Community Council (039578)

Areas not categorised in the Proposed Plan should be zoned for economic use in Local Development Plans where the population is over 500.

Queen Margaret University (040312)

Table 4.1 reference to Queen Margaret University should state: 'Land adjacent to Queen Margaret University will accommodate the Edinburgh Innovation Park and Commercial Hub, providing opportunities for start-ups, with a focus on life sciences, research and learning and food and drink.'

Roslin and Bilston Community Council (790524)

Include infrastructure support for The Bush, including that which benefits local people.

Mention importance of tourism industry and character of area.

RSPB Scotland (031480)

Specific reference should be added to section 4.1 - 4.7 to ensure potential impacts on nature are considered.

Scarborough Muir Group Ltd (929314)

Amend Table 4.1 under opportunities to 'The Rosyth Waterfront Area also has the potential to accommodate a broader range of mixed use development options to reflect previous planning permissions for the redevelopment of this site.'

Scottish Government (034404)

Include reference to Strategic Centres in paragraph 4.5. Paragraph 4.7 should be moved to follow paragraph 4.1. Add recognition of Edinburgh being one of Europe's most important sites for financial services and Tourism.

Paragraph 4.6 should state that LDPs should support opportunities for home working, live work units, micro businesses and community hubs as well as integrating efficient energy and waste innovations within business environments.

Paragraph 4.15 add text to state 'where existing business sites are underused reallocation to enable a wider range of viable business or alternative uses should be considered, carefully accounting for any potential impacts on existing business uses.'

ScottishPower Generation (034698)

Reconsider significant business cluster approach. Take Area of Coordinated Action - Cockenzie to Torness - from Forth Coast Cluster and include separately. Include former Kincardine Power Station in Forth Coast Cluster. Reference Areas of Coordinated Action throughout section in Proposed Plan.

The former Kincardine Power Station site also should be identified as part of the Forth Coast Cluster (Figure 3.4, page 25).

Add additional paragraph 4.16 'Local Development Plans will encourage employment-led regeneration of major brownfield sites, in particular those referenced within NPF3 and any subsequent NPF review which might occur during the SESplan period.'

Scottish Property Federation (037013)

Proposed Plan should address shortage of Grade A office space in city centre and lack of low cost office space in central Edinburgh.

Shawfair LLP (039940)

Consideration should be given to impacts for housing land supply in the surrounding area of Shawfair.

Shepherd Offshore (Scotland) Ltd (038954)

Asks that that Local Authorities ensure records of land supply are up to date.

Mr Julian Siann (024823)

Considers preventing loss of local employment sites to housing should be an objective of the Proposed Plan.

Mr Charles Strang (907037)

Emphasise high quality environment and National Scenic Area in Borders Rail Cluster.

Summary of responses (including reasons) by Planning Authority:

Identification of Significant Business Clusters

Denholm and District Community Council (040612), Edinburgh BioQuarter Partners (037370), Eyemouth Harbour Trust (031900), Forth Ports Ltd (929573), Grange and Prestonfield Community Council (790304), Gullane Area Community Council (037068), Haddington and District Amenity Society (803807), Hallam Land Management Ltd (039805), Hargreaves Services (038881), Kelso Community Council (039365), Linlithgow and Linlithgow Bridge Community Council (930033), Neart na Gaoithe Offshore Wind Ltd (034699), New Ingliston Ltd (929755), Park Lane (Scotland) Ltd (039990), Peebles and District Community Council (039578), Queen Margaret University (040312), Scarborough Muir Group Ltd (929314), Scottish Power Generation (034698), The Crown Estate (Scotland Portfolio) (039431)

Significant business clusters have been included in the Proposed Plan as required in SPP paragraph 98 (ASD06). Clusters can include National Renewable Infrastructure Plan (NRIP) sites, Enterprise Areas and other sites which as a group form broad economic locations of regional significance. Sites within clusters also reflect Areas of

Coordinated Action and sites within NPF3. The Main Issues Report Technical Note on the economy, 2015 (ASD02) and the Main Issues Report, 2015 (ASD12) provide details on sites and cluster identification.

The purpose of the clusters is not to reflect every employment site, industrial site or business park within the region, only those, which when brought together, form a regionally significant grouping of strategic or cross-boundary importance. Local Development Plans are instructed to identify further local business clusters and will also identify standalone major employment sites.

Proposed Plan paragraph 4.5 instructs Local Development Plans to adopt a flexible approach in relation to long term employment opportunities within the clusters. Identification of sites within clusters does not automatically restrict them to a singular employment land allocation or other specific use allocations. These details will be subject to consideration in Local Development Plans.

Clusters or sites within clusters have also not been individually prioritised. This is to ensure locations for employment have the flexibility and ability to be responsive to economic and market needs. **No modification proposed.**

EDF Energy (040462)

It is noted that any redevelopment of Torness Power Station site may not be within the plan period but do not consider any changes are required to the Plan as a result. As a working or decommissioned site Torness remains a contributor to the region's economy and relevant to the Forth Coast Cluster. **No modification proposed.**

Eyemouth Harbour Trust (031900)

Whilst there are opportunities for port use associated with renewable energy at Eyemouth Harbour this is not considered to warrant inclusion in the Forth Coast Cluster at this time. The site does not currently serve this function nor are there known planning proposals at a strategic scale to do so. There is however, a clear statement in paragraph 4.12 of the Proposed Plan which references the potential for Eyemouth Harbour to service offshore wind farms and in addition, Eyemouth has been identified as an area of Strategic Growth 2018-2030. These inclusions are considered sufficient to support future opportunities for Eyemouth Harbour. **No modification proposed.**

Forth Ports Ltd (929573)

The Proposed Plan includes Methil within the Forth Coast Cluster and indicates that a range of uses can be supported within the cluster without ascribing particular uses to each. The Fife Energy Corridor stretches along the Fife Coast from Methil to Longannet (NPF3, Page 14, ASD40) however specific sites are not indicated. It is considered that Kirkcaldy Harbour, whilst having existing port uses, is not of a sufficient scale to be included in the Forth Coast Cluster. **No modification proposed.**

Hallam Land Management Ltd (039805)

It is not considered that inclusion of Craigiehall as part of the West Edinburgh Business Cluster would be appropriate. The site, whilst providing a former employment use for the Ministry of Defence, does not have a current functioning

employment use or planning permission for any further employment use. The examination report for the City of Edinburgh Local Development Plan (ASD03) also concluded that the site had poor public transport access and connections to the existing built up area. This would limit its future development. **No modification proposed.**

Hargreaves Services (038881)

Westfield Surface Mine is included as part of site LWD 009 Westfield Green Business Park in the Fife Proposed Local Development Plan, 2015 (ASD04) and is supported in the subsequent Examination Report (ASD05). However, it is not considered that it warrants inclusion in the specific significant business clusters within the Proposed Plan. It is a standalone site and it is not the purpose of the Plan to identify all individual employment sites, only those, which when brought together, form a regionally significant grouping. Identification of standalone major employment sites is the role of each Local Development Plan. **No modification proposed.**

Neart na Gaoithe Offshore Wind Ltd (034699)

Table 4.1 refers to 'an Area of Coordinated Action' as per page 39 in NPF3 (ASD40). This includes a range of uses for energy and port use "or other uses associated with an Area of Coordinated Action." Whilst Table 4.1 does not specifically reference cables and substations for major offshore wind farm developments it is considered that the references to the Area of Coordinated Action and low carbon energy generation give clear, if no literal, support for such operations. **No modification proposed.**

Queen Margaret University (040312)

Table 4.1 states that land adjacent to Queen Margaret University "*also provides opportunities for start-ups, with a focus on life sciences, research and learning and food and drink.*" It does not reference Edinburgh Innovation Park and Commercial Hub specifically; however it is considered specific site references are a matter to be addressed through Local Development Plans. **No modification proposed.**

Scottish Power Generation (034698)

Cockenzie and Longannet are included within the Forth Coast Cluster reflecting NPF3 (ASD40 pages 14, 29, 33, 37, 39, 63 and 72). In the recent FIFEplan LDP examination report (ASD05) the restriction on low carbon energy related uses on the former Kincardine Power Station site was removed, reclassifying it as a general employment site. Whilst there is flexibility in uses within the clusters, it is not considered relevant to include this general employment site in the Forth Coast Cluster. Further to this the Forth Energy Corridor does not extend to the Kincardine Power Station site. **No modification proposed.**

Scottish Property Federation (037013)

SESplan recognise the importance of suitable office space in economic development. Office space is supported in the Central Business Cluster, which includes the city centre and north Edinburgh, and the West Edinburgh cluster. Other clusters also have the flexibility to provide office accommodation where appropriate. The Strategic Centres (page 49) are also included as locations where office development should be supported. However, specifying the type or category of office space is considered a more detailed matter which is better placed to be addressed in

Local Development Plans. **No modification proposed.**

Mr Charles Strang (907037)

It is considered that the high quality environment of the Borders is referenced in the Assets pages 4 -5. **No modification proposed.**

Supporting Infrastructure and Housing

Mr George Adam (037603), Cockburn Association (037249), Haddington and District Amenity Society (803807), Liberton and District Community Council (790396), Linlithgow and Linlithgow Bridge Community Council (930033), Mrs Mirabelle Maslin (928549), National Trust for Scotland (040626), New Ingliston Ltd (929755), Prestonpans Community Council (039835), Roslin and Bilston Community Council (790524), Scarborough Muir Group Ltd (929314), Shawfair LLP (039940), Taylor Wimpey/Hallam Land (039521), The Crown Estate (Scotland Portfolio) (039431)

It is considered that within the Proposed Plan the significant business clusters and the Spatial Strategy are aligned with areas of strategic growth. This is demonstrated in the Key Areas of Change (pages 19 – 27) and ensures the clusters are supported by infrastructure such as public transport and housing and also allows the impacts on existing infrastructure and housing to be considered.

The majority of the sites listed within significant business clusters either already have an established and functioning employment use or are a brownfield site previously used for employment purposes. This means that for many of the sites there is some form of transport infrastructure in place. Further to this, in reference to the significant business clusters, paragraph 4.5 of the Proposed Plan directs Local Development Plans to “safeguard their future expansion by identifying and safeguarding sufficient land and supporting infrastructure...” **No modification proposed.**

Mr George Adam (037603), Linlithgow and Linlithgow Bridge Community Council (930033)

Junction 3 of the M9 is referred to in Table 6.1, Figure 6.2 and the Action Programme. **No modification proposed.**

Roslin and Bilston Community Council (790524)

Transport infrastructure is dealt with under Issue 14. **No modification proposed.**

Placemaking and Environment

Cockburn Association (037249), Roslin and Bilston Community Council (790524), RSPB Scotland (031480), Scottish Wildlife Trust (038549), Mr Charles Strang (907037)

The Placemaking Principles within the Proposed Plan (paragraphs 3.5 - 3.6 and table 3.1) are to be taken account of through Local Development Plans and associated masterplans, design briefs and development frameworks. These principles will therefore apply to any new development associated with Significant Business Clusters. **No modification proposed.**

Strategic Centres

Scottish Government (034404)

Paragraph 4.7 of the Proposed Plan advises that the strategic centres identified in Place for Communities section are also key areas for investment and economic

development. If the reporter is so minded, to more closely reflect NPF3 pages 12 and 14 (ASD40) the role of the strategic centres could be given more prominence in the opening paragraphs of the Locations for Investment section of the Proposed Plan. **No modifications proposed.**

Financial Services and Tourism

Scottish Government (034404)

Inclusion of text that Edinburgh is “one of Europe’s most important sites for financial services and tourism” effectively repeats NPF3 page 12 paragraph 2 (ASD40). It is considered that the Proposed Plan does recognise Edinburgh as one of Europe’s most important sites for financial services and tourism, using this phrase in table 4.1 in the Central Business Cluster text. **No modifications proposed.**

Changes in Working Environments

Cramond and Barnton Community Council (803443), Edinburgh Association of Community Councils (040476), Scottish Government (034404)

It is acknowledged that changes in the way people work such as flexible hours, remote, agile and home working and live-work units can have an impact on the need for people to travel with environmental and quality of life benefits. Paragraph 95 of SPP (ASD06) supports this, directing plans to encourage opportunities for home-working, live-work units, micro-businesses and community hubs.

SESplan considers that this is a detailed policy matter and can be more appropriately addressed by Local Development Plan policies. Inclusion of text in the SDP directing Local Development Plan’s to encourage such opportunities would merely be a repetition of SPP. SESplan does not consider that the function of an SDP is to repeat national policy. **No modification proposed.**

Environmental Innovations in Business Environments

Scottish Government (034404)

SESplan does not consider it necessary to add additional text in relation to paragraph 96 of SPP in order to direct LDPs to support opportunities for the integration of efficient energy and waste innovations within business environments. To do so would be a repetition of SPP without adding any additional value. SESplan does not consider that the function of an SDP is to repeat national policy. This is a detailed policy matter and can be more appropriately addressed by Local Development Plan policies. **No modification proposed.**

Employment Land Supply

Shepherd Offshore (Scotland) Ltd (038954)

Paragraph 4.13 in the Proposed Plan requires local authorities to identify and safeguard sufficient employment land. Whilst it does not state that Local Authorities must ensure land supply records are up to date this is a requirement of SPP paragraph 102 and does not require repetition in SDPs. **No modification proposed.**

Employment Land and Sites

Edinburgh Association of Community Councils (040476), Grange and Prestonfield Community Council (790304), Liberton and District Community Council (790396), New Ingliston Ltd (929755), North Berwick Community Council (035522), Scarborough Muir Group Ltd (929314), Scottish Government (034404), Mr Julian

Siann (024823)

It is recognised that to enable the region to respond to changing economic needs it is important that Local Development Plans are able to be flexible in relation to employment sites. This flexibility can mean in some circumstances an employment site is recategorised for other uses, including mixed-uses. As supported through paragraph 103 in SPP (ASD06) and paragraph 4.15 of the Proposed Plan.

Scottish Government (034404)

It is considered that the proposed additional wording is not required as it would effectively be a repetition of what is included in Proposed Plan paragraph 4.15. **No modification proposed.**

Tourism

Liberton and District Community Council (790396), Roslin and Bilston Community Council (790524), Wallace Land Investment and Management (930071)

The Proposed Plan does not include a specific section on tourism, however it is considered to be referenced throughout the plan, acknowledging the region's unique assets and their economic value. This includes the SESplan Assets listed on pages 4 and 5, the Spatial Strategy, the Placemaking Principles in table 3.1, the Significant Business Clusters in table 4.1, paragraph 4.8-4.10 on rural economy, paragraphs 5.14 -5.16 on town centres and the Strategic Walking and Cycling routes in figure 6.1. **No modification proposed.**

VisitScotland (029385)

Opportunities for growth around tourism and Leith facilitated by a tram extension are referenced in table 4.1 under the Central Business Cluster. **No modification proposed.**

Rural and Small Businesses

Kelso Community Council (039365), Lammermuir Community Council (039856), Peebles Community Trust (810911)

Paragraphs 4.8 - 4.12 in the Proposed Plan set out SESplan's approach to the rural economy. This section includes promotion of smaller businesses and clusters. Beyond this, detail on smaller businesses should be considered in Local Development Plans. **No modification proposed.**

Offshore Wind

Neart na Gaoithe Offshore Wind Ltd (034699), Scottish Natural Heritage (790587)

The significant business clusters reference port uses as part of the Forth Cost Cluster which may be suitable for servicing renewable energy. **No modification proposed.**

Other

Liberton and District Community Council (790396)

Paragraph 4.14 clearly references access to employment sites by public transport. It is outwith the remit of the SDP to compel public transport providers to increase services, however, the Proposed Plan's spatial strategy promotes development in a sustainable manner. **No modification proposed.**

Mrs Mirabelle Maslin (928549)

Delivery of the Proposed Plan is set out in the SDP Action Programme. It is a requirement that Local Development Plans follow the content of the SDP. **No modification proposed.**

Wallace Land Investment and Management (930071)

The City Region Deal is referenced in paragraphs 2.3 and 2.4 at the start of the Proposed Plan. This states that as the negotiations on the city region deal are continuing its impact on the plan is too early to predict. SESplan is required to submit the Proposed Plan within 4 years of SDP1 approval under planning legislation and therefore cannot delay preparation and submission of the Plan. It should also be noted that the City region Deal could be considered as a means to implementing the SDP rather than a means of influencing the SDP. **No modification proposed.**

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

Reporter's conclusions:

[Note: For DPEA use only.]

Reporter's recommendations:

[Note: For DPEA use only.]