

Issue 14	Strategic Transport Improvements	
Development Plan reference:	Pages 58-62, Paragraphs 6.9 to 6.15	Reporter: [Note: For DPEA use only.]
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mr George Adam (037603) Dr Robin Barclay (029264) CALA Management Ltd (929806) Campaign for Borders Rail (039962) Ms Ailsa Carlisle (037414) Mr John Clark (040286) Cockburn Association (037249) Corstorphine Community Council (929555) Cramond and Barnton Community Council (803443) Damhead and District Community Council (039328) Dunbar Community Council (790195) Mr Stuart Duffy (029738) Edinburgh Association of Community Councils (040476) Edinburgh BioQuarter Partners (037370) Eskbank and Newbattle Community Council (891202) Daya Feldwick (768713) Forth Ports Ltd (929573) Mrs Frankish (040622) Grange and Prestonfield Community Council (790304) Mr Jon Grounell (786916) Gullane Area Community Council (037068) Haddington and District Amenity Society (803807) Hallam Land Management Ltd (039805) Homes for Scotland (040551) Lammermuir Community Council (039856) The John Lewis Partnership (039926) Liberton and District Community Council (790396) Mactaggart and Mickel Homes (038949) Mrs Mirabelle Maslin (928549) D and L McAuslan (040611)</p> <p>Mr William McCulloch (037293) Dr Helen McKay (039852) Midlothian Green Party (778339) Moorfoot Community Council (906008) Musselburgh Conservation Society (927996) Network Rail (928260) Mrs Constance Newbould (034296) Mr David Newbould (039331) North Dunfermline Community Councils and Halbeath TRA (930297) Ocean Terminal Ltd (039645) Park Lane (Scotland) Ltd (039990) Peebles and District Community Council (039578) Peebles Community Trust (810911) Penicuik Estate/Penicuik House Preservation Trust (037926) Prestonpans Community Council (039835) PSL Land Ltd (039196) Queen Margaret University (040312) Rosewell and District Community Council (790523) Roslin and Bilston Community Council (790524) Crawford and Douglas Ritchie (040552) Scottish Government (034404) Scottish Natural Heritage (790587) Shawfair LLP (039940) Shepherd Offshore (Scotland) Ltd (038954) Mr Julian Siann (024823) South West Communities Forum (038954) Mr Charles Strang (907037) Transform Scotland (039136) Trinity Community Council (039995) Wallace Land Investment and Management (930071)</p>		

Provision of the Development Plan to which the issue relates:	Paragraphs 6.9 to 6.15 and Proposed Plan Transport Appraisal
Planning Authority's summary of the representation(s):	
<p><u>Mr George Adam (037603)</u> M9 junction 3 needs to be implemented now. Plan needs to consider local road infrastructure to aid housing development and solve town centre congestion and air pollution.</p> <p><u>Dr Robin Barclay (029264)</u> Consider of ferry connections (passenger/car) to/from Europe.</p> <p><u>CALA Management Ltd (929806)</u> Pressures on the A70 from traffic movement and the restricted ability to expand the road can be actively reduced through development proposals. Provision of a relief road for the A70 as part of wider development proposals would have major environmental benefits for the villages currently affected by traffic and could be delivered in association with development. Concerned about the possible misconception that Curriehill Station is peripheral. A development corridor can encourage improvements.</p> <p><u>Campaign for Borders Rail (039962)</u> Support new development focused along the Borders Railway corridor and consider that development will lead to need for improvements to services and increased frequency necessitating double-tracking of the railway. Support Borders Rail extension.</p> <p><u>Ms Ailsa Carlisle (037414)</u> The A701 relief road should not be in the SESplan as it is not of strategic regional importance. Other reasons for removal are: the Midlothian Local Development Plan (LDP) in which it is contained is not adopted, it will cause significant environmental impact; it will dissect Damhead, an area characterised by small holdings with a rural business community; it will result in the loss of prime quality agricultural land which is not in line with sustainable development principles; and the high cost of building the relief road will far outweigh any benefits. Instead the whole A701 corridor should be examined in line with reducing car travel. Widen it, with a dedicated cycle route from Gowkley Moss with access to the Bush for employees.</p> <p><u>Mr John Clark (040286)</u> Does not support inclusion of A701 Relief Road for the following reasons: It is not of strategic importance, its inclusion is premature as the Midlothian LDP is not adopted; and it will not relieve congestion but increase traffic on the congested A720. It should not be marked as committed in table 6.1 as the route is still very uncertain and has many potential engineering difficulties with cost implications.</p> <p><u>Cockburn Association (037249)</u> Support: tram extension to Newhaven but consider using ground feed power systems to avoid visual impact of power lines; A720 improvements, especially Sheriffhall, subject to minimal green belt land take. Suggest addition of A720</p>	

improvements at A8 and M8 junctions, which are congested. Resources for road maintenance must be increased as many roads in Edinburgh are poor quality. No mention is made of how safeguarded land is to be managed (paragraph 6.13). Every effort should be made to avoid land blight by seeking positive options that could benefit local communities. Concern is raised over A701 Relief Road and A702 Link, Dunfermline Northern Relief Road and Western Distributor Road and Orbital Bus due to loss of green belt land and green belt impacts. Any distributor roads around Dunfermline should use minimal green belt land and visual impacts of these roads should be mitigated as much as possible.

Need for periodic review of best use of the road infrastructure in light of increased road traffic arising from improvements to the road network. Questions whether proposed traffic flows on the new Forth Crossing and existing Forth Road Bridge may need to be re-assessed in the event of increasing volumes of traffic. Suggests potential heritage and tourist appeal of re-opening of car ferry between North and South Queensferry.

Corstorphine Community Council (929555)

Concerned about committed and planned development proposals in West Edinburgh at Gogar, Maybury, Barnton and St. Johns Rd in the village of Corstorphine and subsequent impacts on atmospheric pollution, noise and general degradation of the living environment. Various reports of proposed amelioration measures have been prepared suggesting road improvements and new traffic lights etc. and 'Green Networks' to encourage walking and cycling and limitations on car use and parking etc. but it is generally expected that these measures will prove largely insufficient.

Cramond and Barnton Community Council (803443)

Support cross boundary and other strategic projects but 'Improvements associated with trunk road approaches to Edinburgh' should be included under Section 'A. Strategic Projects 2018-2030' not Section B. Major improvements to junctions and relief of pressures on A90 and A8 approaches to Edinburgh and corridors within the City boundary are vital.

Representation seeks that any proposals for increased capacity at Edinburgh Airport should recognise noise and pollution impacts for those most affected by close vicinity to flight paths, particularly for residents at Cramond and Barnton.

Damhead and District Community Council (039328)

A701 Relief Road and A702 Link road are not strategic and should not be included in the Strategic Development Plan (SDP). The Midlothian LDP is not yet adopted. There is no benefit to the A701 relief road taken against the cost to the community and loss of prime agricultural land. These considerations are disproportionate to any benefit to traffic congestion. Would affect a vibrant business community. Will not achieve the intended goal as it does not link the A701 with the bypass. Any intended benefit for accessing the Bio Campus or Bush Estate could easily be achieved in a much more effective manner. The importance of this area cannot be underestimated as it gives the opportunity of green pathways from built up areas to the Pentland Hills. The constraints of this proposed road due to adverse ground levels and ground conditions have been largely ignored. The Council despite

having a consented scheme for more than 8 years have failed to realign the A701. The suggested route bypasses the Park and Ride at Straiton therefore reducing the benefits of the P&R facility. No satisfactory transport appraisal carried out to warrant a new relief road. The only understandable reason for its inclusion to any plan would be to create a boundary up to which new housing could be built in order to pay for itself. A701 relief road contrary to Green Network principles. This in essence would not be a "relief road" at all. The A701, A702 and the A703 from Penicuik to the City Bypass are more than adequate. Improvements should be made to existing roads and a roundabout at Hillend and Easter Bush along with a Park and Ride at Hillend would be a more suitable solution.

Dunbar Community Council (790195)

Support reopening of East Linton rail station. Needs to be an increase in parking at Dunbar station. Support dualling of A1 and need for junction improvements.

Mr Stuart Duffy (029738)

SDP needs to include transport improvements in Western Fife including: Dualling the road between Kincardine and Dunfermline as a 'missing link' in the road network offering a faster and safer option for traffic driving North across the Queensferry Crossing through Fife to Central Scotland. This is a faster route from Fife to Glasgow than using the Queensferry Crossing route, which, when opened, will add extra time to a commute from Dunfermline to Glasgow than using the Kincardine route. Commitment to new stations at Valleyfield, Newmills and Kincardine on Dunfermline - Alloa line to benefit tourism. Many Fifers now commute to Glasgow and have to rely on road or bus links at the moment. Make it easier and faster for commuters in Fife to get to the West.

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

Support Strategic Transport Improvements but cannot only be achieved with heavy rail and buses. Suggest study early in plan period in the potential for using parts of the rail network for light rail with new links as needed between sections and branches to new growth areas. This study should also look at investment funding possibilities and would enhance longer term sustainable objectives.

Edinburgh BioQuarter Partners (037370)

Concern that A720 improvements are not a priority for the 2018-2030 period by not including them in section A of table 6.1. Funding and delivery of A720 improvements should be prioritised during the 2018-2030 period, especially as the contributions framework will not be produced until 1 year after plan approval. Distinction between section A and Section B is unclear.

Eskbank and Newbattle Community Council (891202)

Concern raised over inclusion of A701 Relief Road as it has not been subject to a traffic study and early analysis indicates that this would give almost no relief to congestion.

Daya Feldwick (768713)

Does not support inclusion of A701 Relief Road for these reasons: It is not of strategic importance; its inclusion is premature as it is not in the adopted Midlothian

LDP; it will not relieve congestion but allow vehicles to travel quicker between congested areas; Prime Quality Agricultural Land will be lost; it will destroy community of Damhead; SYSTRA study over estimates benefits and underplays significant negative impacts on air quality, water quality, drainage and flood defence, biodiversity and habitats, landscape, visual amenity, agriculture and soils and cultural heritage.

Forth Ports Ltd (929573)

Don't support routing of transport proposals through Forth Ports operational estate.

Text in paragraph 6.14 does not fully recognise the extent or requirements of modern port operations and considers this may be detrimental to future development.

Mrs Frankish (040622)

Object to the inclusion of the A701 Relief Road these following reasons: It is not of strategic importance; its inclusion is premature as it is not in the adopted Midlothian LDP; the road will serve only to encourage further congestion and road traffic and will not address the problems of congestion that are a result of an outdated bypass system; it is inconsistent with the Damhead Neighbourhood Plan; Prime Quality Agricultural Land and green belt will be lost; and it will dissect the forward thinking community of Damhead.

Mr Jon Grounsell (786916)

Plan for a Borders Rail extension to Berwick upon Tweed and a High Speed Rail (HSR) link from West Edinburgh, including airport, directly through the Borders to Newcastle upon Tyne, with an interchange where the two cross. Would save 30 miles off journey.

Does not consider tram extensions effective in facilitating growth and modal shift.

Gullane Area Community Council (037068)

Considers transport interventions identified to be of particular importance for East Lothian.

Haddington and District Amenity Society (803807)

Should not base any housing allocations on Strategic Longer Term Transport Projects because these may not be delivered. Development should only be based on committed section A schemes.

A study should be commissioned into a rail link to Haddington should be introduced, more than just reliance on buses.

Development should be close to public transport and centres. Ease of movement and therefore transport interventions are fundamental to the success of the plan and there must be a commitment to infrastructure improvements in East Lothian.

Hallam Land Management Ltd (039805)

Cross boundary contributions will fund mitigation interventions on A90 bus corridor.

Lammermuir Community Council (039856)

Reston Station should be prioritised and the extension of the Borders Railway scoped. Dualling sections of the A1 north of Berwick should be a priority.

The John Lewis Partnership (039926)

Support measures to improve movement in Edinburgh, including Tram extension with a new stop at Picardy Place.

Liberton and District Community Council (790396)

Support section as the road network has no capacity for increased development proposed. The aims probably could only be achieved by being bolder and promoting investment in improved facilities such as new and improved bus and rail/ light rail / tram services plus additional park and ride facilities. Current public transport infrastructure and services also need to be improved.

Mactaggart and Mickel Homes (038949), Shepherd Offshore (Scotland) Ltd (038954)

Paragraph 6.13 could be more forceful and provide more direction/guidance to stakeholders and safeguarding land.

Mrs Mirabelle Maslin (928549)

Considers that roads are already congested and transport interventions are not described fully enough.

Paragraphs 6.9 to 6.13 - Much of this should be activated before work begins on the many more 1,000s of dwellings.

Table 6.1 The concept of a Dunfermline Northern Relief Road and a Western Distributor Road is flawed when considered in the face of the need to encourage non-car transport. Question how it will be funded. The plan should include a requirement to increase capacity of passenger trains between Dunfermline and Edinburgh.

The so-called A701 relief road is ill-conceived. Its impact will be destructive to the environment, it will be of high financial cost, and it will achieve almost nothing in terms of improving traffic flow. Please investigate widening and improving the road to Bush from Gowkely Moss Roundabout as a viable objective, together with the possibility of it connecting with the proposed A702 link.

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

D and L McAuslan (040611)

The A701 Relief Road in the coming period 2018-2030 should be re-evaluated for the following reasons: the proposal is in its infancy and we would question the viability of the land to be used; while much of the higher ground land is of prime quality agricultural land, there is a section which hosts a thriving population of marsh grasses and therefore to build a dual carriageway across such land will be costly and likely to cause problems; many of the objectives described in this proposed SESplan look to a cleaner, greener future and this proposal does not

accord with these; the land to the west of the current A701 could certainly benefit from further walkways, cycle ways and public transport; is contradictory to statements in supporting non car travel section of plan; and it does not comply with the vision for 2038 thriving, successful and sustainable. In order to preserve a unique area of green belt. The current area is comfortably in alignment with many of the objectives of the placemaking principles. However, the blight that would be caused by the A701 Relief Road would destroy a community and further increase the congestion problem, which ultimately is against many attempts to reduce our carbon footprint. It should be replaced with investment into making public transport easier and have even more people cycling and walking to work. This relief road should be suspended, as there are a number of supplementary guidance, transport options and appraisals required until due consideration of the validity of the project is completed. Land for housing has already been identified without the further work undertaken to confirm the validity of the project.

Mr William McCulloch (037293)

Consider that the plan overlooks the arterial nature of the B7026 and its potential to ease development pressure on, and traffic flow within Penicuik and suggest it should be considered part of the A701 corridor. Should be recognition that certain local plan policies hamper the implementation of the Proposed Plan in the area of the B7026.

Dr Helen McKay (039852)

A701 'relief' road should not be included in SDP. Public transport should be improved from the major commuter towns and villages to a much wider range of destinations within the city. Not justified in terms of robust evidence or improving traffic flows as commuters don't travel to the east and therefore the 'relief' road would provide almost no benefit for commuters or local resident. It would also result in the loss of green belt and prime quality agricultural land. It is not strategic, not in an adopted LDP and does not cross a local authority boundary and therefore should not be in the SDP. It would also split the community of Damhead. Park & Rides should be further out of town to reduce the number of vehicles using the A701, A702, and A703. Linked to the improvements in public transport, it is urgent to create safe cycle paths and walkways for people who would like to use more sustainable and healthy forms of transport from the South and Southeast into Edinburgh and vice versa. Ideally these would be well separated from motorised vehicles.

Midlothian Green Party (778339)

Question the basis for some transport proposals. Consider that it is not clear that any potential route for the tram extension has been identified and as a result the Proposed Plan is likely to deliver the additional road but not the tram. Consider that there will be a need to extend the double track sections of the Borders Railway. The A701 Relief Road should be removed from the Plan and replaced with a safeguarded route for the tram extension to the Bush. Capacity improvements on the Borders Railway should be prioritised.

Moorfoot Community Council (906008)

Paragraph 3.7 acknowledges that increased traffic congestion is an issue but the only proposed solution to this is 'key strategic transport improvements', rather than

reducing travel demand by locating housing closer to places of work 'and vice versa'. The Growth Corridors strategy relies heavily on the Borders Railway but this line already has significant capacity problems, and improvements to the existing line are not listed in Table 6.1 (Strategic Transport Improvements). There needs to be prioritisation through SDP2 and City Deal to extending the double track sections of the line. Without this, the aim of reducing commuting by road to Edinburgh will fail resulting in greater road congestion.

Musselburgh Conservation Society (927996)

Essential that transport infrastructure needed to justify and support development is delivered if our region is not to grind to a halt with all the growth proposed in this plan. There should be a simple rule: 'No essential supporting infrastructure, no development'. Transport Interventions need to be committed not potential or longer term to support planned development. This includes Sheriffhall Upgrade, East Coast Mainline 4 Tracking, and Edinburgh Cross-Rail.

Growth in the corridor to Penicuik will not be adequately served by public transport without a dedicated and fast public transport link. The former rail line to Bilston is could be utilised.

Network Rail (928260)

Clarify inclusion of Edinburgh Cross Rail Services as there are already cross rail services from North Berwick and Tweedbank. Need to Clarify what East Coast Mainline Ongoing and Planned Improvements are. Clarify that Edinburgh-Glasgow Rail Improvements is EGIP Project. Question inclusion of four line section between Blindwells and Drem when Network Rail Scotland Route Study indicates option between Prestonpans and Drem. Support aims of paragraphs 6.10 and 6.13.

Mrs Constance Newbould (034296)

Against the inclusion of the A701 relief road for the following reasons: it will not provide any relief for the A701; it will result in the loss of prime quality agricultural land and destroy green belt; it will contravene the Damhead Neighbourhood Plan; upgrading 3 existing roads are required; contravenes SESplan vision for healthier communities; and Bush commuters already use the A702 and then the link road from Easter Howgate to the Bush estate. Instead improvements should be made to A702 and A703, increased bus provision from Penicuik and West Linton and deliver the park and ride at Hillend.

Mr David Newbould (039331)

A701 realignment will not relieve traffic congestion as there is no proposed extra housing being built along its route. Widening would cause least disruption, maintain the landscape and could accommodate cyclists. Para 3.18 does not mention new roads, only upgrades and improvements.

North Dunfermline Community Councils and Halbeath TRA (930297)

Nothing is done to test the accuracy of transport needs noted by the Local Authority. Acceptance of these needs without independent assessment of the data disservices communities. Halbeath Rail Halt cannot go ahead due to live pipelines.

Ocean Terminal Ltd (039645)

Seek clarification of timescales for delivery of the tram.

Park Lane (Scotland) Ltd (039990)

Contributions framework will mitigate impacts on A8 bus corridor with park and ride sites. These should be on figure 6.2 reflecting Local Transport Strategy.

Peebles and District Community Council (039578)

Does not address cross region connectivity, particularly in the Scottish Borders. The East-West A72 is not fit for purpose. Future economic, including tourist, development will exacerbate significant failures in current provision. The Borders Railway does not currently maximise the opportunity of rail connectivity.

Peebles Community Trust (810911)

Want to see more explicit reference to improvement in east-west transport links, notably in the Scottish Borders, where current provision is poor. The importance of these links is over-looked with emphasis placed on the spoke transport corridors leading in and out of the centre of the region.

Penicuik Estate/Penicuik House Preservation Trust (037926)

Tram extension to Penicuik and Dalkeith should be included because: it was included and positively appraised as part of Strategic Transport Projects Review (STPR); it performed well against key objectives including public transport attractiveness and capacity, interchange possibilities and maintaining a labour market within a 60 minute commute. Also question why tram extensions are planned for well connected by rail locations of Newcraighall and QMU rather than large settlements of Dalkeith and Penicuik which don't have sustainable link.

Prestonpans Community Council (039835)

Transport links connecting East Lothian to Edinburgh and the M8 corridor are operating at beyond capacity. There are no funded proposals to improve the North Berwick line, A1 or City Bypass.

PSL Land Ltd (039196)

Proposed Plan should be amended to reflect the current status of the proposed A701 Relief Road and A702 Link. The indicative alignment shown within Figure 6.2 is not a committed development; is subject to detailed design, environmental assessment and has no designated funding in place to secure its delivery. The alignment shown would have the potential to impact on the Pentland film studio development, deemed to be of national importance, and therefore jeopardise job creation and investment. The factual position of the Road should therefore be reflected within an amended Table 6.1.

Queen Margaret University (040312)

A1 Junction at QMU should be prioritised to unlock development near QMU and 4 tracking brought into section A of table 6.1.

Rosewell and District Community Council (790523)

Support section but long journey times and circuitous routes do not encourage bus commuting to Edinburgh, increasing use of private car.

Roslin and Bilston Community Council (790524)

Midlothian suffers from urgent traffic problems that need solutions before any more houses are built. The A701 is inadequate for any kind of traffic volume and in poor repair. The A720 is gridlocked on a regular basis. The proposed A701 relief road will not solve any problems. Alternatives need to be considered.

Crawford and Douglas Ritchie (040552), Homes for Scotland (040551)

Support for directing growth into and along public transport corridors, but finds plan is deficient in detail to show how infrastructure will be implemented for Long Term Growth Corridors beyond 2030, particularly in the run up to 2030.

Mr Julian Siann (024823)

Concern that tram extension to Newhaven will be of marginal benefit. No funding is in place and that it cannot be funded through development as there are not enough wealthy developers to fund it. The versatility of the existing bus services and the amenities provided on the waterfront will determine whether development goes ahead.

Scottish Government (034404)

The Halbeath Rail Halt and Levenmouth Rail Link should be moved to Strategic Longer Term projects as neither of these projects have the relevant appraisals required to support their inclusion nor is it certain that they will be concluded in time for them to come forward by 2030. Including them does not meet requirements of Scottish Planning Policy (SPP) paragraph 277.

Remove reference to any Edinburgh cross-rail project within Section B. This is not an option being tested within the cumulative cross boundary appraisal and Transport Scotland is not aware of any form of appraisal currently being undertaken.

Figure 6.2 should be referenced in the text under Strategic Transport Improvements. Figure 6.2 should be made clearer by adding distinction between projects including differing levels of new or improved, commitment, delivery and funding as set out in Table 6.1. The figure itself lacks critical information and a suitable key.

Modify paragraph 11 to indicate that projects listed in section C of Table 6.1 are aspirational at this stage and that further appraisal work is required on their rationale, viability and deliverability. This would more accurately reflect the status of the schemes and clearly set out that further work is required on the deliverability in accordance with SPP paragraphs 274, 275 and 277.

SDP2 Transport Appraisal does not meet requirements set out in SPP paragraphs 274 and 275. The Transport Appraisal undertaken for the SDP fails to recognise, or identify transport interventions required to support delivery of the impact of the spatial strategy given the longstanding issues with SDP1, and does not identify specific infrastructure measures to mitigate the SDP2 allocations. The TA effectively defers to the SDP1 focussed Cumulative Cross Boundary Study (CBS) to provide such details and information and fails to clearly identify the mitigation measures required on the trunk road network to support delivery of the SDP

allocations, and how they will be funded and delivered. SDP2 TA report fails to identify the infrastructure required to deliver the SDP strategy, which, given the lack of information on this within SDP1, is a significant issue. Overall the Appraisal states "the strategic impacts are widely distributed and relatively minor", yet the evidence presented suggested there are several junctions along the A720 trunk road which are forecast to exceed capacity with no mitigation measures identified. TA work undertaken for SDP2 requires providing a greater level of detail. It is not appropriate that subsequent LDPs should be left to identify mitigation measures, as currently included on page 33. SPP expects that planning authorities appraise the impact of the spatial strategy on the transport network in line with Development Planning and Management Transport Appraisal Guidance (DPMTAG). Furthermore, development plans should identify any required new transport infrastructure. It is therefore not compliant or practical to delay the requirement for identifying SDP2's potential impact and any necessary mitigation measures to a later date and to state this will be brought forward through LDPs.

Scottish Natural Heritage (790587)

Need for cross referencing on Table 6.1 and Figure 6.2 of related transport and active travel projects, including Orbital Bus. A801 improvements should include walking and cycling infrastructure.

Shawfair LLP (039940)

Imperative that constraints to transportation are actively addressed without further delay. Should go further to emphasise focus on these areas at LDP level.

Shepherd Offshore (Scotland) Ltd (038954)

Imperative that constraints to transportation are actively addressed and the SDP ensures a joined up approach between authorities and wider stakeholders.

South West Communities Forum (038954)

Public transport investment will not prevent private car use. Transport charges increase development costs. Trams work when masterplanned not on existing settlements. Homes, workplaces, shopping and leisure facilities closer together reduce travel.

Mr Charles Strang (907037)

The need for a safeguarded route from Tweedbank to Berwick should be identified. Cross boundary transport (paragraph 3.7) should include references to England and in particular to the Pennine Way.

Do not consider approach outlined in paragraph 6.15 to be in line with the principles of sustainable development. Suggests inclusion of an Environment section of the Proposed Plan.

Transform Scotland (039136)

Considers that improved public transport facilities will be essential to Blindwells and support proposed station at East Linton.

Increasing importance of Shawfair Station likely to lead to demand for higher frequency services necessitating double tracking of the railway.

Opposed to some of the road proposals listed this section - Dunfermline Northern Relief Road and Western Distributor Road, A701 Relief Road and A702 Link and A1 Dualling. These projects are in conflict with National Performance Framework priorities on transport, climate change, and equalities

Include following in Proposed Plan: Dunfermline Rail By-pass; Reinstate the railway from Cowdenbeath north towards Kinross and Bridge of Earn.

Trinity Community Council (039995)

Need to undertake a strategic review of transport needs and identify and resolve cross boundary issues within North Edinburgh. Ferry Road is beyond capacity.

Wallace Land Investment and Management (930071)

Consider that enhancements to the park and ride at Drem station should be expressly stated.

Modifications sought by those submitting representations:

Mr George Adam (037603)

Table 6.1 - Insert statement that M9 J3 should be implemented as a priority.

Dr Robin Barclay (029264)

Modify paragraphs 6.14/6.15 to add reference to ferry connections to and from Europe.

Campaign for Borders Rail (039962)

Table 6.1 - Include requirement for double-tracking of the Border Railway from north of Shawfair to Portobello Junction.

Ms Ailsa Carlisle (037414)

Replace A701 relief road and A702 link with A701 road and cycleway improvements.

Mr John Clark (040286)

Table 6.1 - Delete A701 Relief Road and A702 Link. Failing that, include incorporation of "further Appraisal" in Table 6.1.

Cockburn Association (037249)

Paragraph 3.18 - Clearly set out the case for and against the Damhead relief road.

Paragraph 6.9 - Insert following statement 'Review ground feed power systems for the tram operation so that expansion of the tram system may consider this low visual impact option'.

Paragraph 6.9 - Insert following statement 'All transport improvements should minimize land take from sensitive areas (e.g. green networks/green belt) and require high quality mitigation measure'.

Paragraph 6.9 - Insert following statement 'Improve the design of Park & Rides sites to increase the amount of tree and shrub planting'.

Review sustainability of all aspects of traffic flows to and from Fife.

Paragraph 3.24 - Include a statement to monitor the effectiveness of current traffic

proposals for the Forth road crossings and implement changes if and when these may be required.

Paragraph 3.26 - Include a requirement for a high standard of landscape design for the Dunfermline Northern Relief Road in order to mitigate adverse effects upon the Dunfermline green belt in this area.

Cramond and Barnton Community Council (803443)

Table 6.1 - Modify by moving 'Improvements associated with trunk road approaches....' to under section A Strategic Projects 2018-2030.

Paragraph 6.15 - Modify that any increase in capacity at Edinburgh Airport should recognise noise and pollution impacts for those most affected by close vicinity to flight paths, particularly for residents at Cramond and Barnton.

Damhead and District Community Council (039328), Roslin and Bilston Community Council (790524)

Table 6.1 and Figure 6.2 - Remove A701 Relief Road and A702 Link. Replace with A701, A702 and A703 upgrades.

Mr Stuart Duffy (029738)

Figure 6.2 and Table 6.1 – Modify to include: Stations at Valleyfield, Newmills and Kincardine on the Dunfermline - Alloa Line Dualling the A985 between Dunfermline (A823M) and Kincardine.

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

Include commitment to undertaking light rail study early in plan period.

Edinburgh Association of Community Councils (040476)

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

Edinburgh BioQuarter Partners (037370)

Table 6.1 - Move 'A720 Improvements....' from section B to section A

Eskbank and Newbattle Community Council (891202), D and L McAuslan (040611), Daya Feldwick (768713), Dr Helen McKay (039852), Mrs Constance Newbould (034296), Mrs Frankish (040622), Mrs Mirabelle Maslin (928549), Ms Ailsa Carlisle (037414), Transform Scotland (039136), Mr David Newbould (039331)

Table 6.1 and Figure 6.2 - Remove A701 Relief Road and A702 Link.

Daya Feldwick (768713)

Undertake an A701 corridor study looking at all transport modes which should follow SESplan Supporting Non-car travel principles and SEStran Transport Hierarchy.

Forth Ports Ltd (929573)

Paragraph 6.14 – Modify text to read as follows: 'Freight by rail, road, sea and air plays an essential role in the regional economy. The freight handling capacity of

ports around the Forth is essential for North Sea shipping routes. Local Development Plans will support Increased Freight Handling Capacity of Ports on the Forth, the requirements of modern operations to ensure that they provide for global requirements and the need for associated infrastructure, safeguarding land where appropriate'.

Modify subject heading above paragraph 6.14 to read: 'International and National Transport Developments'.

Mrs Frankish (040622)

An assessment of alternative transport options to the A701 relief road that do not compromise rural and greenbelt communities must be undertaken.

Mr Jon Grounsell (786916)

Table 6.1 and Figure 6.2 - Include Borders Rail extension to Berwick.

Table 6.1 and Figure 6.2 - Include HSR link from West Edinburgh to Newcastle through Borders, with Borders Railway interchange.

Commission study on effectiveness of tram system.

Gullane Area Community Council (037068)

Prioritise major upgrades to the Edinburgh City Bypass and improvements to the strategic road and rail networks and local road networks.

Haddington and District Amenity Society (803807)

No modification is specified, representation indicates modify paragraphs 6.9 to 6.13 to include commitment to study into dedicated rail link to Haddington.

Lammermuir Community Council (039856)

Insert statements that the following projects should be prioritised: Dualling sections of the A1 north of Berwick; Reston Station and scoping study for Borders Railway Extension.

Mactaggart and Mickel Homes (038949), Shepherd Offshore (Scotland) Ltd (038954)

Paragraph 6.13 - provide more direction/guidance on how stakeholders can come together to align programmes and provide a coordinated investment approach.

Mrs Mirabelle Maslin (928549)

No modification is specified, representation indicates...

A list of specific transport interventions and timescales should be included.

Table 6.1 and Figure 6.2 - Remove Dunfermline Northern Relief Road and West Distributor Road.

Table 6.1 and Figure 6.2 - Include investigate widening and improving the road to Bush from Gowkely Moss Roundabout and possibility of connection to A702 Link.

Table 6.1 and Figure 6.2 – Include commitment to increasing track capacity of the Borders Railway and to increase parking facilities at stations.

D and L McAuslan (040611)

If not removed altogether, then the A701 Relief Road should be moved from Strategic Projects 2018 - 2030 in Table 6.1 (Strategic Transport Improvements) to

Strategic Longer Term Projects, beyond 2030.

Mr William McCulloch (037293)

Include the B7026 Auchendinny to Howgate road as part of the A701 corridor.

Dr Helen McKay (039852)

Include reference to improved public transport routes from south Midlothian.
Include Park & Rides further out of town to reduce the number of vehicles using the 701,702, and 703.

Include safe cycle paths and walkways in Midlothian.

Midlothian Green Party (778339)

Figure 6.2 and Table 6.1 - Remove A701 Relief Road and A702 Link. Replace with safeguarded tram route to the Bush.

Include statement that capacity improvements on Borders Railway should be prioritised.

Moorfoot Community Council (906008)

Table 6.1 - include commitment to upgrade the capacity of the Borders Railway, including double track sections.

Musselburgh Conservation Society (927996)

Table 6.1 - Sheriffhall Junction Upgrade should be committed and moved to section A. Table 6.1 - Edinburgh Cross-Rail services should be committed and moved to section A. Table 6.1 - East Coast Mainline 4 tracking should be committed and moved to section A. Table 6.1 and Figure 6.2 - Add dedicated transport link along the growth corridor to Penicuik.

Include statement that no allocations should be based on potential or long term project unless there is certainty that they will be delivered.

Network Rail (928260)

Table 6.1 - Clarify entries for East Coast Mainline Ongoing and Planned Improvements and Edinburgh Cross Rail Services.

Table 6.1 Add EGIP after Edinburgh- Glasgow Rail Improvements.

Table 6.1 Section C - Modify to read East Coast Mainline: formation of four line section of track between Prestonpans and Drem, including new station and over bridge for Blindwells.

Mrs Constance Newbould (034296)

Increase bus provision from Penicuik and West Linton and deliver park and ride at Hillend.

Table 6.1 - Upgrade A702 with a new junction at the north end of the Scientific Park at Easter Bush.

Table 6.1 - Upgrade the A703 with a new cycle way.

Table 6.1 - Provide a link from the Carnwath area near the A74 to come round the west side of the Pentlands and connect to the west side of the A720 near Hermiston Gait to link with the new infrastructure in the Proposed Plan.

Mr David Newbould (039331)

Table 6.1 - Include widening of the A702 as it approaches the A720 around the

tight bends on the side of the Pentland Hills.

Table 6.1 - Include widening of A701 from the Gowkley Moss Roundabout to the dual carriageway at Straiton.

Park Lane (Scotland) Ltd (039990)

No modification is specified, representation indicates modify Figure 6.2 to include A8 bus and park and ride improvements.

Peebles and District Community Council (039578)

Insert a statement that a plan for cross region transport should be developed including trunking of A72.

Extending the Borders Railway to Carlisle should be considered a priority and further sections of "twin track" constructed to upgrade and improve services are undertaken immediately.

Peebles Community Trust (810911)

No modification specified, representation indicates modify Table 6.1 and Paragraph 6.9 to include reference to improvement in east west transport links, notably in the Scottish Borders.

Penicuik Estate/Penicuik House Preservation Trust (037926)

Table 6.1 - Modify Tram extensions line to state: 'Tram extensions: York Place to Newhaven*; City Centre to Edinburgh BioQuarter, Dalkeith and Penicuik*; Newhaven to Granton*; Roseburn to Granton* and Ingliston to Newbridge*'.

Prestonpans Community Council (039835)

No modification specified, representation indicates modify Table 6.1 to include improvements to the North Berwick rail line.

PSL Land Ltd (039196)

Table 6.1 - Insert symbols for Non Committed and Further Appraisal Required for A701 Relief Road and A702 Link.

Queen Margaret University (040312)

No modification is specified, representation indicates the following modifications:

Table 6.1 - Prioritise A1 Junction Improvements at QMU.

Table 6.1 - Move East Coast Mainline four tracking to section A.

Rosewell and District Community Council (790523)

No modification is specified, representation indicates....

Insert statement requiring bus routes to be direct with shorter times.

Crawford and Douglas Ritchie (040552), Homes for Scotland (040551)

No modification specified, representation indicates....

More detail required on how infrastructure will be implemented for Long Term Growth Corridors beyond 2030.

Scottish Government (034404)

Table 6.1 - Move Halbeath Rail Halt and Levenmouth Rail Link from section A to section C.

Table 6.1 - Delete Edinburgh Cross-Rail Services.

Paragraph 6.9 - Insert statement that projects identified in table 6.1 are shown on Figure 6.2.

Figure 6.2 - Clearly annotate to show distinction between new or improvements and levels of commitment delivery and funding as set out in Table 6.1.

Paragraph 6.11 - Modify to read 'Section C of Table 6.1 sets out aspirational strategic longer term projects that may not be delivered in this plan period but are supported by SEStran and SESplan member authorities. They have the potential to improve journey times, reduce congestion, support economic growth and increase the accessibility of towns. However, those marked § will require further appraisal work to determine their rationale, viability and deliverability'.

Scottish Natural Heritage (790587)

Table 6.1 - include walking and cycling infrastructure improvements alongside A801 Improvements.

Table 6.1 - Include Orbital Cycle Route alongside Edinburgh Orbital Bus and Associated Park and Ride.

Shawfair LLP (039940), Shepherd Offshore (Scotland) Ltd (038954)

Include direction that LDPs actively seek to deal with transport infrastructure constraints.

Shawfair LLP (039940)

Actively address transport constraints on main arterial routes to and between Edinburgh and its fringes to the west, south and east.

Mr Charles Strang (907037)

Table 6.1 and Figure 6.2 - safeguard Borders Rail extension to Berwick.

Paragraph 3.7 - Modify to include references to England and in particular to the Pennine Way.

Paragraph 6.15 - Modify to either:

- i. make a commitment to reducing internal flights and halt Airport expansion; or
- ii. Provide clearer information on environmental impacts of Airport expansion.

Transform Scotland (039136)

Table 6.1 and Figure 6.2 - Delete Dunfermline Northern Relief Road and Western Distributor Road.

Table 6.1 and Figure 6.2 - Delete A1 Dualling.

Table 6.1 – Include following proposals: Dunfermline Rail By-pass; Reinststate the railway from Cowdenbeath north towards Kinross and Bridge of Earn as a strategic cross boundary transport improvement.

Trinity Community Council (039995)

No modification specified, representation indicates...

Strategic transport improvements should be identified in North Edinburgh and included within Table 3.1.

Wallace Land Investment and Management (930071)

Table 6.1 – Include under section A ‘Enhanced park and ride facility at Drem Station’.

Summary of responses (including reasons) by Planning Authority:

City of Edinburgh Issues and Transport Infrastructure

CALA Management Ltd (929806)

There are no current proposals for an A70 relief Road and no level of planned or proposed development that would require it. Curriehill station is currently infrequently served by services to Glasgow and Edinburgh. **No modification proposed.**

Cockburn Association (037249)

Specification of the power systems for the tram is not an SDP matter. **No modification proposed.**

Corstorphine Community Council (929555)

Transport impact mitigation options for West Edinburgh are set out in the Edinburgh LDP and its accompanying Action Programme. The need for additional development in West Edinburgh will depend on housing land estimate during the production of the next Edinburgh LDP and that plan's analysis and regeneration strategy. **No modification proposed.**

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

The Cross Boundary Study (ASD48) and Network Rail Scotland Route study (ASD80) are considering improvements to the rail network based on future populations in the region. The South Suburban Line is safeguarded in the Edinburgh LDP (ASD03) but there is no consideration of its use for passenger services at this time. **No modification proposed.**

Mr Jon Grounsell (786916)

Studies reviewing the usage of the tram have been undertaken and will influence future decision on tram extensions. **No modification proposed.**

The John Lewis Partnership (039926)

The exact location of tram stops is a matter for the Tram developers. Indicative locations for stops are safeguarded in the City of Edinburgh LDP (ASD03). **No modification proposed.**

Ocean Terminal Ltd (039645)

Delivery timescales of the tram extensions will be set out in the Action Programme and Edinburgh LDP Action Programme. **No modification proposed.**

Mr Julian Siann (024823)

The decision on funding the tram extension to Newhaven will be taken by City of Edinburgh Council in 2017. Developer contributions are being sought towards partially funding tram network improvements. **No modification proposed.**

Trinity Community Council (039995)

Improvements within North Edinburgh are set out in the Edinburgh LDP (ASD03) and subsequent Action Programme. Only strategic projects critical to plan delivery and cross boundary infrastructure is set out in the SDP. Cross Boundary

movement is appraised in the Cross Boundary Study (ASD15) and a series of additional mitigation measures are suggested to address identified hotspot locations on the existing network.. Further work will be done to consider delivery of these mitigation measures in preparing the cross boundary transport contributions framework (para 6.16 Proposed Plan, Page 63) stated. In advance of that the types of strategic interventions proposed as mitigation within the Proposed Plan are set out in section B of Table 6.1. **No modification proposed.**

East Lothian Issues and Transport Infrastructure

Dunbar Community Council (790195)

Car Parking at Dunbar station is a matter for East Lothian Council, Network Rail and SEStran. East Lothian Proposed LDP (ASD09) safeguards land for platform lengthening at Dunbar Station. **No modification proposed.**

Haddington and District Amenity Society (803807)

Transport interventions become committed and funded as development proposals are progressed. Therefore it is not possible to base future strategic scales of development on committed schemes only. The Haddington Rail proposal is not supported in the Strategic Transport Projects Review, the SEStran Delivery Strategy or East Lothian LDP. Paragraphs 6.1 to 6.4 of the Proposed Plan set out the required relationships between development and public transport and town centres. **No modification proposed.**

Queen Margaret University (040312)

The SDP does not prioritise the delivery of necessary transport infrastructure over others in different areas of the region as SESplan is not a funding or decision making body with regards to transport infrastructure spending. Details of plans and delivery of these schemes are set out in the accompanying Action Programme and East Lothian LDP (ASD09). **No modification proposed.**

Prestonpans Community Council (039835)

Platform lengthening proposals on the North Berwick line and interventions at A1 junctions are set out in greater detail in the East Lothian Proposed LDP (ASD09). Section B of Table 6.1 sets out that interventions will be delivered on the A720. The exact nature of those will be identified through ongoing appraisal work. This will be reflected in an updated Action Programme. AECOM, on behalf of Transport Scotland are undertaking a detailed study on design options for Sheriffhall Roundabout and East Lothian Council are proposing to gather contributions for improvements at Old Craighall. **No modification proposed.**

Wallace Land and Investment and Management (930071)

Park and Ride sites are not shown on diagram 6.2 or individually set out in Table 6.1. The East Lothian LDP (ASD09) indicates that car park provision may be expanded at Drem Station. There is no need to identify this explicitly in the SDP. **No modification proposed.**

Fife Issues and Transport Infrastructure

Mr Stuart Duffy (029738)

The Fife LDP (ASD79) and Action programme includes information on the Rosyth Bypass. However, dualling of the road to the Kincardine Bridge is not proposed and

it is not included in the SEStran Regional Transport Strategy (RTS) or RTS Delivery Plan. Locations of stations on any future Dunfermline-Alloa passenger service is a matter for a future technical study and not this SDP. Work has begun to consider the implications on the transport network following the closure of Longannet Power Station in March 2016 with a 'Longannet Strategic Transport Pre-Appraisal – Part 1: Problems and Issues' being undertaken. If further work occurs on this and when their location of proposed stations is determined they should be safeguarded in the LDP as set out in paragraph 6.13. **No modification proposed.**

Cockburn Association (037249)

Design and exact routing of the Dunfermline Relief Road and Distributor road and its impact on the Dunfermline Green Belt is a detailed matter not appropriate for this SDP. All relevant considerations, including land take, will be taken into account when the schemes are designed. **No modification proposed.**

Scottish Government (034404)

The annotation in Table 6.1 and wording of Paragraph 6.9 is quite clear that neither the Halbeath Rail Halt nor Levenmouth Rail Link are committed improvements. A Scottish Transport Appraisal Guidance appraisal has been completed for the Levenmouth Rail Link. These qualified inclusions in the plan are more detailed than those included in Figure 2 of the currently approved SDP. Therefore their qualified inclusion is in compliance with SPP (ASD06). Moving both improvements into section C of Table 6.1 would indicate that they will not be developed before 2030. However, subject to future decisions, they could be developed within the first 12 years of the Proposed Plan, including any potential infrastructure funding proposals that may emerge from City Deal or decisions on Network Rail investment periods. There is strong support from Fife Council for both projects. It is not the role of a development plan to only repeat already committed infrastructure investment; rather it should set out what infrastructure may be required. The Halbeath Rail Halt is included in the Action Programme under Action 38: Park and Ride sites. **No modification proposed.**

Mrs Mirabelle Maslin (928549)

Capacity of Fife Circle Services is being reviewed as part of the Network Rail Scotland Route Study (ASD80).

The SDP supports non car transport and the need for modal shift however, the Dunfermline Western Distributor Road and Northern Relief Road projects are required to support the strategic scale of development planned in Dunfermline. They are contained within the adopted Fife LDP (ASD79). Developer contributions are being sought towards the Dunfermline road projects set out in the SDP and within Fife Council's supplementary guidance on planning obligations. Details are set out in the Fife LDP (2017) and accompanying Action Programme. **No modification proposed.**

North Dunfermline Community Councils and Halbeath TRA (930297)

The Fife LDP Transport Appraisal was produced through partnership working with Transport Scotland, its conclusions agreed by Transport Scotland and included as part of the Fife LDP examination (ASD05). Table 6.1 sets out that further appraisal

of the Halbeath rail Halt is required. It is not a necessary requirement to allow current planned development to proceed. **No modification proposed.**

Midlothian Issues and Transport Infrastructure

Mr William McCulloch (037293)

It is not considered that improvements to the B7026 are a matter for the SDP. They are not required to support a scale of development critical to plan delivery or cross boundary in nature. The matter is more appropriately dealt with by the Midlothian LDP and SEStran. **No modification proposed.**

Transform Scotland (039136)

Neither suggested project is included in the Fife LDP, SEStran RTS, RTS Delivery Plan, current STPR or Network Rail Scotland Route Study. Therefore there is no basis for including them in the SDP. **No modification proposed.**

Musselburgh Conservation Society (927996), Midlothian Green Party (778339),
Penicuik Estate / Penicuik House Preservation Trust (037926)

The extension of Edinburgh Tram to Gilmerton, the Bush and Penicuik is only identified as being in the conceptual stage in the SEStran Delivery Plan (ASD46) and it is not included as a potential proposal in the Edinburgh LDP, Midlothian LDP or SDP1. Whilst there are merits to the proposal as a sustainable mode along the A701 corridor to Penicuik, it does not have support for inclusion in the SDP at this stage. **No modification proposed.**

A701 Relief Road and A702 Link

Cockburn Association (037249)

Reasoning behind the A701 Relief Road and A702 is more appropriately set out in the Midlothian LDP and accompanying Transport Appraisals. Additional detail is also set out in the SDP and LDP Action Programmes. It is not appropriate for a concise and graphic based SDP. **No modification proposed.**

Eskbank and Newbattle Community Council (891202), D and L McAuslan (040611), Daya Feldwick (768713), Dr Helen McKay (039852), Mrs Constance Newbould (034296), Mrs Frankish (040622), Mrs Mirabelle Maslin (928549), Ms Ailsa Carlisle (037414), Transform Scotland (039136), Mr David Newbould (039331)

The proposal is necessary in order to deliver the development strategy in the A701 corridor and the active travel and public transport improvements brought about by freeing up capacity on the existing stretch of road between the A720 / A701 and A703 / A701 junctions. It is acknowledged that depending on the final routing and specification of the A701 relief road and A702 link, there is likely to be development on green belt and prime quality agricultural land.

The proposal is also required to be identified in the SDP as it is a strategic improvement that would impact on cross boundary movement through its connection to the A720 and City of Edinburgh.

The issue of the A701 Relief Road and A702 Link is being examined in detail under issue 7 as part of the Midlothian LDP examination. This has a target date of 09 Jul 2017. Even accounting for some slippage, the examination report will be available

before the examination of the SDP is closed. It is proposed that the matter is more appropriately dealt with at the Midlothian examination. Therefore no modification is proposed unless through the Midlothian LDP examination, the A701 Relief Road and A702 Link is modified in a way that would change its notation in the Proposed Plan. **No modification proposed.**

Damhead and District Community Council (039328), Roslin and Bilston Community Council (790524), Mr David Newbould (039331)

As above, as it is not proposed to delete reference to the A701 Relief Road and A702 Link, then it will not be replaced with improvements, including widening, to the A701, A702 and A703. **No modification proposed.**

Mr John Clark (040286)

As above, as it is not proposed to delete reference to the A701 Relief Road and A702 Link, then it will not be marked that further appraisal is required. Appraisals of the proposal were undertaken for the Midlothian LDP. **No modification proposed.**

D and L McAuslan (040611)

As above, Midlothian Council is considering commission work to progress survey and design work in the near future. Impact assessments and appraisals were undertaken as part of the Midlothian LDP process. As the project is likely to be delivered before 2030, it is not appropriate to move it into section C of table 6.1. **No modification proposed.**

Daya Feldwick (768713), Mrs Frankish (040622)

As above, the proposed scheme was included as part of an appraisal of options for the LDP. Therefore a further A701 study is not required and alternative assessments are not required. **No modification proposed.**

Dr Helen McKay (039852)

Bus services in Midlothian are a matter for the local and regional transport strategies, not the SDP. Strategic functional and recreational cycle routes in Midlothian are proposed in the Walking and Cycling section of the plan. Localised routes are more appropriately dealt with in the Midlothian LDP and transport strategy. Park and ride provision is addressed in section B of Table 6.1 and accompanying Action Programme. More detail on proposals is set out in the Midlothian LDP and accompanying Programme. **No modification proposed.**

Mrs Constance Newbould (034296)

Bus services in Midlothian are a matter for the local and regional transport strategies, not the SDP. The Park and Ride at Hillend is included in the SESplan Action Programme and is part of the Orbital Bus proposal. The suggested A74-A720 link running to the west of Pentlands is a matter for the upcoming reviews of the National Transport Strategy and STPR. It is not included in any current strategy or plan. **No modification proposed.**

PSL Land Ltd (039196)

Midlothian Council formally abandoned the former Local Plan A701 safeguarded road scheme referred to by PSL Land Ltd, earlier this year in favour of the A701 relief road and A702 link in the Midlothian Proposed Plan. **No modification**

proposed.

Scottish Borders Issues and Transport Infrastructure

Lammermuir Community Council (039856)

With regards to Reston Station, the SDP does not prioritise the delivery of necessary transport infrastructure over others in different areas of the region as SESplan is not a funding or decision making body with regards to transport infrastructure spending. In January 2017, further commitment was given by Scottish Government, East Lothian Council and Scottish Borders Council towards new stations at East Linton and Reston. **No modification proposed.**

Peebles Community Trust (810911), Peebles and District Community Council (039578)

It is noted that East-West connections in the Scottish Borders could be improved. With regards to improvements to the A72, the Trunk Road Network is a national asset developed and managed by Scottish Government agency Transport Scotland. The network has been reviewed and rationalised over the years and there is no evidence to suggest that Transport Scotland would consider expanding the network in the Scottish Borders in the future. **No modification proposed.**

West Lothian Issues and Transport Infrastructure

Mr George Adam (037603)

With regards to M9 Junction 3, the SDP does not prioritise the delivery of necessary transport infrastructure over others in different areas of the region as SESplan is not a funding or decision making body with regards to transport infrastructure spending. **No modification proposed.**

Borders Railway

Campaign for Borders Rail (039962), Lammermuir Community Council (039856), Midlothian Green Party (778339), Moorfoot Community Council (906008), Peebles and District Community Council (039578), Mrs Mirabelle Maslin (928549), Transform Scotland (039136)

Representations seek commitments to priority improvements in capacity on the Borders Railway, including new double track sections. Transport Scotland is currently undertaking a Pre-Feasibility Transport Corridor Study which includes the proposal to extend the railway to Hawick and Carlisle, along with other potential rail and road improvement schemes. Transport Scotland has indicated that the reporting for this study will be towards the end of 2017. In addition to this, Scottish Borders Council made official representations to Network Rail within the consultation phase of the Scotland Route Study, which is part of the longer term planning process for Network Rail and helps to influence decision making between 2019 and 2029. The response recommended the provision of additional dynamic loop provision to help improve service reliability and functionality on the existing Borders Railway and also recommended train lengthening for both peak and off-peak services to help cope with existing and predicted patronage levels. Any changes in the status of the project will be reflected in updates to the SESplan Action Programme. The SDP does not prioritise the delivery of necessary transport infrastructure over others in different areas of the region as SESplan is not a funding or decision making body with regards to transport infrastructure spending. **No modification proposed.**

Mrs Mirabelle Maslin (928549)

Car Parking at Borders Rail stations is a matter for Scottish Borders Council, Midlothian Council, Network Rail and SEStran. **No modification proposed.**

Lammermuir Community Council (039856), Peebles and District Community Council (039578)

Pre-feasibility study for Borders Railway extension to Carlisle is underway. The SDP does not prioritise the delivery of necessary transport infrastructure over others in different areas of the region as SESplan is not a funding or decision making body with regards to transport infrastructure spending. Paragraph 6.13 requires LDPs to safeguard land required. **No modification proposed.**

Mr Charles Strang (907037), Mr John Grounell (786916)

The suggested extension to Berwick is a matter for the upcoming reviews of the National Transport Strategy and STPR. It is not included in the Scottish Borders LDP, current STPR, SEStran RTS or Delivery Plan. **No modification proposed.**

Regional and Cross Boundary Issues and Infrastructure

Lammermuir Community Council (039856)

Regarding the A1, the SDP does not prioritise the delivery of necessary transport infrastructure over others in different areas of the region as SESplan is not a funding or decision making body with regards to transport infrastructure spending. **No modification proposed.**

Cockburn Association (037249)

Transport Scotland will be monitoring effectiveness of the Queensferry Crossing. It is not appropriate to set this out in an SDP. **No modification proposed.**

Mr Jon Grounell (786916)

The alignment of the HSR route to England is being considered by Scottish Government, the Department for Transport and Network Rail. **No modification proposed.**

Mactaggart and Mickel Homes (038949), Shepherd Offshore (Scotland) Ltd (038954)

Wording of paragraph 6.13 regarding safeguarding is considered sufficient. More detail on infrastructure investment is set out in the Action Programme. **No modification proposed.**

Shawfair LLP (039940), Shepherd Offshore (Scotland) Ltd (038954)

Additional direction to LDPs is not considered necessary. **No modification proposed.**

Edinburgh BioQuarter Partners (037370)

SESplan recognises the importance of delivering improvements to the A720. They are included in section B of Table 6.1 within the Proposed Plan as developer contributions and other funding sources will be required towards identified interventions from the Cross Boundary Transport Appraisal. Updated information on A720 interventions will be set out in updated Action Programmes. AECOM, on

behalf of Transport Scotland are undertaking a detailed study on design options for the Sheriffhall Roundabout and East Lothian Council are proposing to gather contributions for improvements at Old Craighall. **No modification proposed.**

Gullane Area Community Council (037068)

SESplan recognises the importance of delivering improvements across the regional transport network, including the A720. The SDP does not prioritise the delivery of necessary transport infrastructure over others in different areas of the region as SESplan is not a funding or decision making body with regards to transport infrastructure spending. A series of additional mitigation measures are set out within a cross boundary study which has been prepared for Transport Scotland to address identified hotspot locations on the existing network. Further work will be done to consider delivery of these mitigation measures in preparing the cross boundary transport contributions framework (para 6.16 Proposed Plan, Page 63) stated. In advance of that the types of strategic interventions proposed as mitigation within the Proposed Plan are set out in section B of Table 6.1. **No modification proposed.**

Hallam Land Management (039805), Park Lane (Scotland) Ltd (039990)

Any detailed proposals for the A8 and A90 corridors are set out in the City of Edinburgh LDP and Action Programme. **No modification proposed.**

Mr Charles Strang (907037)

Specific references to projects are not appropriate at that introductory paragraph. Figure 6.1 shows recreational routes connecting to England. **No modification proposed.**

Scottish Government (034404), Network Rail (928260)

Edinburgh Cross Rail Services relate to service improvements to allow more cross Edinburgh services that would allow those in East Lothian, Midlothian and Scottish Borders to access employment areas in West Edinburgh (Gyle, Edinburgh Park) and along the M8 Corridor (Livingston). This would be achieved by not terminating North Berwick services at Edinburgh and joining up Fife Circle and Borders services (some Fife to Borders services already operate). Doing so could encourage modal shift of journeys off the A720 westbound in the AM peak reducing forecast impacts on the bypass in the Cross Boundary Study and SDP2 Transport Appraisal. Cross Edinburgh services improvements were suggested by both SEStran and SESplan as mitigation options to the Cross Boundary Project. SESplan will clarify in the Action Programme that this proposal does not involve upgrades to the South Suburban Service. An analysis of the deliverability of the required service modifications will be required to be undertaken in consultation with Transport Scotland, Network Rail and ScotRail. **No modification proposed.**

Network Rail (928260)

East Coast Mainline Improvements relate to proposed platform lengthening in East Lothian as well as potential improvement to approaches to Edinburgh Waverley set out in the Network Rail Scotland Route Study.

The Action Programme entry clarifies that the Edinburgh-Glasgow Rail Improvements is the Edinburgh Glasgow Improvements Programme (EGIP). It is

not required to use such specific terminology in Table 6.1 as the acronym EGIP is not widely understood outside a professional environment.

Wording regarding East Coast Mainline four line section of track is not incorrect as that is what would be required to deliver an additional settlement at Blindwells. However, it is understood that the formation of four line section of track between Prestonpans and Drem is now being considered but is not committed. If the Reporter feels a change is required, then the line in Section C of Table 6.1 could be replaced as suggested. **No modification proposed.**

National Transport Infrastructure

Dr Robin Barclay (029264)

Services, including ferry connections to continental Europe, are a matter for the Regional Transport Partnership. There is currently a freight only service between Rosyth and Zeebrugge. **No modification proposed.**

Cramond and Barnton Community Council (803443)

Noise assessments are covered by separate planning requirements and it is not appropriate to repeat these here. Routing of flight paths is a matter for separate legislation and not a matter for the SDP. **No modification proposed.**

Forth Ports Ltd (929573)

The National Transport developments section in the plan relates to statements on national developments within the SESplan area in NPF3 (ASD40). Therefore it is not appropriate to rename the section. The existing wording of paragraph 6.14 is adequate and is in compliance with the statements in NPF3 whereas the proposed modification goes beyond the scope of NPF3. Exact makeup of land uses requiring planning permission at ports must be considered in reference to neighbouring and planned uses and is therefore an LDP matter. **No modification proposed.**

Mr Charles Strang (907037)

NPF3 (ASD40) states that "enhancement of the gateway role of Edinburgh Airport will bring economic and connectivity benefits". It also identified that enhancements to the airport are National Developments. Therefore SESplan cannot halt airport expansion. SESplan does not control the level of internal flights to / from Edinburgh Airport.

Environmental impacts of airport expansion will be set out in the Airport Masterplan and documents accompanying planning proposals. An environmental section of the plan is not required as it is a cross cutting theme throughout, with particular references in spatial strategy, supporting non-car travel and placemaking principles.

No modification proposed.

Other Matters

Cockburn Association (037249)

Design and exact routing of transport schemes, including planting, is a detailed matter not appropriate for this SDP. All relevant considerations, including landtake and landscaping, will be taken into account when the schemes are designed.

Decisions on maintenance and repair of roads are matters for individual Councils

and trunk road contractors and not a matter for an SDP. **No modification proposed.**

Crawford and Douglas Ritchie (040552), Homes for Scotland (040551)

A series of additional mitigation measures are set out within a cross boundary study which has been prepared for Transport Scotland to address identified hotspot locations on the existing network. Further work will be done to consider delivery of these mitigation measures in preparing the cross boundary transport contributions framework (para 6.16 Proposed Plan, Page 63) stated. In advance of that the types of strategic interventions proposed as mitigation within the Proposed Plan are set out in section B of Table 6.1. Table 6.1 sets out transport projects that are to be delivered across the plan period as well as longer term projects. Non cross boundary interventions are set out in LDPs. The statutory review period for SDPs requires submission of a proposed plan within four years of the current plan's approval date. This presents several opportunities in the run up to 2030 to set out interventions required to support growth beyond 2030. They will be set out in subsequent SDPs once appropriate assessments have been undertaken. **No modification proposed.**

Forth Ports Ltd (929573)

Exact routing of proposals is not an appropriate matter for the SDP. **No modification proposed.**

Liberton and District Community Council (790396)

Noted. The plan sets out a range of multi modal transport projects and the strategy seeks to promote non-car travel. **No modification proposed.**

Moorfoot Community Council (906008), South West Communities Form (038954)

As set out in the Spatial Strategy section of the plan and the Schedule 4 for Issue 1, the Proposed Plan and LDPs are locating development in around existing settlements where shops, public transport services and jobs are located. The housing strategy of the Proposed Plan is to deliver a higher proportion of housing within Edinburgh, where approximately half of future jobs in the region are expected to be located. Therefore housing will be located nearer to workplaces and the strategy is not reliant on long distance commuting. **No modification proposed.**

Musselburgh Conservation Society (927996)

It is noted that essential infrastructure required to support development should be delivered. More details are included in LDPs and their action programmes. However, neither the Edinburgh cross-rail or Sheriffhall upgrade are yet formally funded and therefore cannot be confirmed as committed and moved to column A. However, a further design study is underway for the latter. **No modification proposed.**

Rosewell and District Community Council (790523)

Specific bus routes and frequencies are not an SDP matter. **No modification proposed.**

Scottish Natural Heritage (790587)

Strategic Walking and Cycling Routes are included in Table 6.1. There is no need

to specifically reference Orbital Route.

No walking and cycling plans are included in the A801 proposals at this stage. This is a matter for West Lothian Council. **No modification proposed.**

Transform Scotland (039136)

A701 and Dunfermline road proposals are required to deliver development. A1 dualling is required to improve connectivity, journey times and road safety along this key East Coast Corridor. **No modification proposed.**

Mr George Adam (037603)

Whilst important, local road infrastructure is an LDP matter. **No modification proposed.**

Mrs Mirabelle Maslin (928549)

Specific interventions and their timescales are set out in the Action Programme. **No modification proposed.**

Scottish Government (034404)

SESplan does not agree that further changes are required to paragraph 6.11. All the schemes apart from High Speed Rail are marked as 'not committed' therefore there can be no impression that the schemes have already been approved subject to further study. They may not be delivered in the plan period but they are supported by SEStran and SESplan member authorities. The addition of 'aspirational' diminishes this strong level of support and implies that these projects will never be delivered. The use of further appraisals implies that this will cover rational, viability and deliverability. It is not required to state explicitly every aspect that will be assessed in these appraisals. **No modification proposed.**

It is clear from reading the Proposed Plan that the diagrams are meant to be read alongside the text. With Figure 6.2 this also means reading the corresponding Table 6.1, which sets out the individual projects shown on the diagram and provides more information on their current status and level of commitment. Setting out this status in Figure 6.2 would result in it having an overly complicated legend and the diagram becoming cluttered, difficult to interpret and dated. Amendment to Figure 6.2 is not considered necessary as a result. Details of appraisals, funding, current status and delivery mechanisms are more appropriate content for the Action Programme, not the concise and visionary SDP. However, if the Reporter feels that further clarification is required, a footnote could be added to Figure 6.2 requiring it to be read in alongside Table 6.1 and additional text could be added to paragraph 6.9 directing readers to the accompanying Action Programme, LDPs and LDP Action Programmes where more detail on these matters is available. A series of additional mitigation measures are set out within a cross boundary study which has been prepared for Transport Scotland to address identified hotspot locations on the existing network. Further work will be done to consider delivery of these mitigation measures in preparing the cross boundary transport contributions framework (para 6.16 Proposed Plan, Page 63) stated. In advance of that the types of strategic interventions proposed as mitigation within the Proposed Plan are set out in section B of Table 6.1 **No modification proposed.**

The outline methodology for the Transport Appraisal was discussed in advance with Transport Scotland's Technical Analysis Branch before the Appraisal was undertaken. SESplan therefore disagrees with Scottish Government's response to the Transport Appraisal (ASD47).. The Appraisal as discussed with Transport Scotland in late 2015 / early 2016 takes a proportionate approach and builds on the emerging outputs of the Cross Boundary Study (CBS) (ASD48).

The CBS contract was awarded in spring 2014 and was originally programmed to be finished in summer 2015. SESplan and other key stakeholders received the final report on the 26 April 2017 (ASD48).

The key components of the CBS are:

- to predict transport impacts from journeys which cross Local Authority boundaries and are predicted to occur as a result of development from the current SDP;
- to identify possible transport interventions which could resolve these transport impacts;
- to set out the type, and likely scale of these interventions; and
- to understand how effective these interventions would be.

The CBS gathered information from the six member authorities to determine the likely amount and location of development which would take place up to the year 2024. It looked at information on land allocated for housing or employment development in proposed and adopted LDPs (non-committed land) and land with planning permission and also any other significant development sites with planning permission (committed land). This distinction was made as land which was considered 'committed' would not be able to contribute to funding infrastructure as legal agreements required to secure funding to address the impacts of development could not be applied retrospectively. The study also takes into account any transport infrastructure which is due to be completed within the SESplan region up to 2024.

The CBS used national transport, economic and land use modelling (TELMoS) to identify the likely patterns of development across South East Scotland by predicting the distribution of people, jobs and households. This development data was then further analysed using a regional transport model to establish the number and frequency of cross boundary transport movements and where problems are forecast to occur in the transport network as a result.

The CBS considers transport movements as they were in the year 2014 / 2015 (the 'Baseline') and compared this with two different scenarios. Firstly, it compares the baseline with the transport movements predicted to occur as a result of the committed development in the region i.e. what would happen if all the development with planning permission was built. This is referred to in the CBS as the 'Reference Case'. Secondly, it compares the baseline to transport movements as a result of the committed and the non-committed development i.e. what would happen if all the development set out in the current SDP and sites with planning permission were built. This scenario is referred to in the CBS as the 'Test Case'. Both scenarios included transport infrastructure which was considered to be

committed i.e. had funding or was a requirement of committed development. The second scenario which considered the additional impact from non-committed development was the most important. This is because the non-committed development would be the source of any funding in relation to the development contributions framework.

The key facts from the CBS can be summarised as:

- The CBS includes journeys which cross member authority boundaries made by public transport as well as by private car. It was important to consider different modes of travel as there are pressures on public transport, such as overcrowded train services, which will make it harder to try and get people to use public transport over private cars. The results found that 80% of cross boundary trips were made by private car with the remaining 20% by public transport;
- The largest number of trips which cross member authority boundaries are from journeys to or from the City of Edinburgh. This reflects Edinburgh's status as having the largest concentration of existing households and a significant proportion of employment sites in the region;
- The majority of trips can be attributed to commuting; and
- In looking at the base, test and reference cases the study finds that there are existing problems with cross boundary transport movements in the region's transport network such as congestion and capacity on both road and rail services. Demands on the transport network from both committed and non-committed development will add to this.

It is important to remember that the purpose of the CBS was to look at cross boundary trips rather than problems isolated to one member authority. This is to ensure that a contributions framework could be directly attributed to the direction of growth from the strategic plan.

The key findings from the CBS can be summarised as:

- Travel demand is predicted to increase as a result of committed development by 10% for road and 7% for public transport by the year 2024;
- Travel demand is predicted to increase a further 3 - 4% by both road and public transport as a result of non-committed development;
- Travel demand is predicted to exceed network capacity at key locations including the A720, A8, M8, M90, the Queensferry Crossing and capacity at Waverley and Haymarket rail stations in both the reference and test case;
- Junctions on the A720 (Edinburgh City Bypass) where demand exceeds capacity include Sheriffhall, Newbridge, Hermiston Gait, Gogar and Old Craighall;
- Demand exceeds capacity at the Barnton and Maybury junctions in Edinburgh city in both scenarios;
- There are problems with lack of connectivity on key regional cycling and walking routes between local authorities;
- Delays due to road congestion increase by 25 - 40% from committed development and a further 10 - 15% from non-committed development whilst

actual length of journeys increases by a smaller amount; and

- Delays due to road congestion increase at a much higher rate than the distance travelled as a result of both committed and non-committed development and add to an already congested road network.

In terms of cross boundary journeys:

- Journeys crossing member authority boundaries as a result of new development both committed and non-committed are only a small part of travel demand in the region;
- Cross boundary journeys from non-committed development i.e. land which is allocated for housing or employment within proposed or adopted LDPs that do not have a current planning consent are predicted to account for 1.5% of total travel demand;
- The study found that by examining the morning peak hour of travel by road there were around 35,000 cross boundary trips. 2,900 of these would be from non-committed development. Overall road demand in the region is approximately 207,000 am trips;
- The main demand for public transport cross boundary trips is to and from Edinburgh. Of 59,000 public transport trips (am) 11,000 are cross boundary and 900 would be as a result of non-committed development. PM patterns were similar; and
- The scale of intervention which could be delivered to directly address the impact of cross boundary trips generated by non-committed development is likely to be small in the context of the overall transport network and have limited impact on performance.

The CBS also finds that there is demand for further trips which are not represented as the route are already overcrowded and that this situation would be made worse with the addition of non-committed development. The study finds that this would push many parts of the network 'beyond practical limits at critical locations'.

As set out above, SESplan confirmed the outline methodology for the Transport Appraisal for the Proposed Plan with Transport Scotland's Technical Analysis Branch before the Appraisal was undertaken and that it would take a proportionate approach building on the emerging outputs of the CBS.

The methodology was confirmed with the consultants SYSTRA as set out in the Transport Appraisal covering paper and chapters 1 and 2 of the SYSTRA produced Transport Appraisal Report (ASD47). In summary, the CBS relates to the current SDP therefore the Transport Appraisal assesses the additional development set out in the Proposed Plan above that which is assessed in the CBS. To meet the housing targets within the Proposed Plan, current housing land estimates are that additional development will be required in the City of Edinburgh only. As set out in paragraph 5.8 of the Proposed Plan, the other SESplan member authorities have current estimates of land supply higher than the Proposed Plan housing targets and requirements. This approach is proportional to the limited scale of additional development required by the Proposed Plan and builds on the previous SDP and LDP appraisals, as well as the Accessibility Analysis undertaken at the Main Issues Reports stage (contained within Spatial Strategy Technical Notes (ASD37)).

Chapter 3 of the Transport Appraisal report identifies the impacts of the additional development in Edinburgh and compares it to the impacts identified in the CBS. The table on page 22 (ASD47) identifies that at the SESplan regional scale the additional impacts are minimal with 1% increases in distance travelled and network travel time compared to comparative 27% and 41% increases from the 2012 base to CBS. Within City of Edinburgh the impacts are higher, particularly around North Edinburgh due to the level of development in the adopted LDP that is phased to be delivered from 2024 onwards, as well as a high level of evidence of urban windfall. Impacts are identified along the A8 corridor, likely due to additional housing at the International Business Gateway Updated West Edinburgh transport improvements are now further identified in the updated Action Programme (ASD50).

Testing packages of mitigation options is one of the outputs of the CBS. It was agreed at a methodology meeting in March 2016 that the Proposed Plan Transport Appraisal would not be able to test mitigation measures until the mitigation measures and their impacts were available in the completed CBS. Chapter 5 of the Transport Appraisal Report (ASD47) therefore sets out potential interventions in outline detail only. The slippage in the CBS timescales could not be allowed for within the Proposed Plan preparation timetable, as it has to be prepared within statutory timescales and submitted for examination by end June 2017. SESplan had previously raised concerns with Transport Scotland regarding the slippage in timescales for the CBS and how it would not align with Proposed Plan statutory timescales and its Transport Appraisal.

The response refers to impacts at Hermiston Gate. The response incorrectly states that SESplan identifies allocations. This is incorrect. The SDP does not allocate sites but identifies the level of housing to be delivered over the 12 year plan period. In compliance with SPP paragraph 118 (ASD06) and set out in Proposed Plan paragraph 5.10, the exact level of additional land to be allocated and location of these sites cannot be determined until LDP preparation. Therefore identifying detailed interventions and delivery strategies to mitigate impacts cannot be undertaken until the exact level of additional development and location of sites is identified. This will not occur until the Edinburgh LDP is being prepared, post approval of the Proposed Plan in 2018. Regarding delivery and funding mechanisms, SESplan is not deferring all decisions to the CBS. The information contained in the CBS as set out in paragraphs 6.16 – 6.19 of the Proposed Plan will be used by SESplan to inform the preparation of Supplementary Guidance on a Cross Boundary Transport Contributions Framework, to be adopted within one year of Plan approval. This guidance will set out a mechanism for seeking obligations from developers to contribute towards the cost of the transport interventions required as a result of their development. Adopted and Proposed LDPs also contain approaches towards delivering and funding necessary transport infrastructure in line with SDP1 policies 8 and 9. At the time of preparing the Proposed Plan, due to delays in the CBS it was not possible for SESplan to go into much further detail on funding and delivery mechanisms as the evidence from the CBS was not available to be assessed and used to inform decisions. Given the scale of the impacts identified in the CBS and the likely costs of some of the interventions on nationally important trunk roads or rail alternatives, funding from Scottish Government / Transport Scotland will be required. The upcoming review

of the National Transport Strategy will look at how the strategic challenges facing the transport system can be addressed. It will also inform the review of the Strategic Transport Project Review (STPR2) by providing a clearly defined set of strategic transport objectives.

The response refers to the adequacy of the SDP1 Transport Appraisal. However, it should be noted that the level of detail sought would not have provided the accurate information on impacts or interventions due to the subsequent Scottish Ministerial modifications to SDP1 that significantly increased the housing land requirement. The level of detail, using site specific locations of development, was only possible in the CBS because it was undertaken whilst LDPs were being prepared.

SESplan and its member authorities wish to continue to work constructively with Transport Scotland and Scottish Government to identify interventions and delivery and funding mechanisms, given the importance of the SESplan region as a driver of the national economy, as set out in NPF3. A series of additional mitigation measures are set out within a cross boundary study which has been prepared for Transport Scotland to address identified hotspot locations on the existing network. Further work will be done to consider delivery of these mitigation measures in preparing the cross boundary transport contributions framework (para 6.16 Proposed Plan, Page 63) stated. In advance of that the types of strategic interventions proposed as mitigation within the Proposed Plan are set out in section B of Table 6.1 **No modification proposed.**

Support for specific projects set out in Table 6.1 was received from seven different organisations not listed in this issue.

Reporter's conclusions:

[Note: For DPEA use only.]

Reporter's recommendations:

[Note: For DPEA use only.]