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| <b>Issue 16</b>  | <b>Other Infrastructure</b>   |  |
| <b>Development Plan reference:</b>   | <b>The Vision<br/>Key Areas of Change South East<br/>Key Areas of Change Edinburgh and West<br/>A Place for Communities</b> | <b>Reporter:</b> [Note: For DPEA use only.]  |
| <b>Body or person(s) submitting a representation raising the issue (including reference number):</b>   |   |  |
| Builyeon Farms LLP (835897)<br>CALA Management Ltd (929806)<br>Cramond and Barnton Community Council (803443)<br>The Trustees of Sir C M Dalrymple (835899)<br>Denholm and District Community Council (040612)<br>Dunbar Community Council (790195)<br>H and H Group Plc (927998)<br>Homes for Scotland (040551)<br>Mrs Jane Kellock (039869)<br>Mactaggart and Mickel Homes (038949)  |   | Mrs Mirabelle Maslin (928549)<br>NHS Lothian Public Health and Health Policy (840024)<br>North Dunfermline Community Councils and Halbeath TRA (930297)<br>Mrs Gail Reid (035887)<br>Rosewell and District Community Council (790523)<br>Mr Julian Siann (024823)<br>Wallace Land Investment and Management (930071)<br>Winchburgh Developments Ltd (832800) |
| <b>Provision of the Development Plan to which the issue relates:</b>   | Delivery of non-transport infrastructure associated with development.   |  |
| <b>Planning Authority's summary of the representation(s):</b>  |   |  |
| <p><u>Builyeon Farms LLP (835897)</u><br/>         Education is a strategic matter and should be dealt with by the Strategic Development Plan (SDP). Stating that actions relating to education may be considered strategic but are dealt with in Local Development Plan (LDP) Action Programmes is wrong. Failure to deliver education provision will result in a failure to deliver the scale of house building required.</p> <p>The Proposed Plan should be accompanied by a cost plan to clearly outline infrastructure costs and funding streams for delivery. Must be empirically tested to demonstrate need and costed so that certainty of delivery and cost implications are known to landowners, developers and communities. The Action Programme must contain greater financial detail on deliverability of infrastructure projects.</p> <p>Proposed Plan gives insufficient information on infrastructure projects, their deliverability and funding. Insufficient evidence on impact and importance of City Deal proposals to help deliver infrastructure of emerging LDPs. Lack of joined up approach to strategic funding arrangements necessary to deliver the development strategy in the Plan. No clear and coherent delivery strategy in the Plan to enable</p> |   |  |

infrastructure to remove development constraints particularly for education provision. Should make it clear that it is the responsibility of individual Local Authorities to prioritise infrastructure investment decisions to deliver them in an efficient and timeous manner.

The representation indicates this is of particular importance for education within the City of Edinburgh Council area, particularly South Queensferry.

CALA Management Ltd (929806)

Education is a strategic matter and should be dealt with now by the SDP and Local Authorities and is a council wide issue. Failure to deliver education provision will result in a failure to deliver the scale of house building required. Not appropriate, reasonable or legal to continue to assume that new development alone should pay for education provision. Raises serious concern regarding inaccuracies in Action Programme.

The approach to Funding Transport Infrastructure is reactive rather than proactive and takes no account of the need to deliver committed and future development sites. The delivery of strategic infrastructure, including education, needs addressed as a critical immediate issue to allow existing house building rates to continue in individual Local Authority areas.

Insufficient detail in the Proposed Plan and action programme of how funding will be put in place to support and enable infrastructure provision. Insufficient funding strategies for the provision of infrastructure may lead to delays to the development process.

Cramond and Barnton Community Council (803443)

When assessing sites for housing development, consideration should be given to the provision of local medical services (e.g. GP services) as experience in local communities of North and West Edinburgh are that current services are operating over-capacity and cannot service proposed housing developments. Currently they are given insufficient consideration.

The Trustees of Sir C M Dalrymple (835899)

Education is a strategic matter and should be dealt with by the SDP. Stating that actions relating to education may be considered strategic but are dealt with in LDP Action Programmes is wrong. Failure to deliver education provision will result in a failure to deliver the scale of house building required. The Proposed Plan should be accompanied by a cost plan to clearly outline infrastructure costs and funding streams for delivery. Must be empirically tested to demonstrate need and costed so that certainty of delivery and cost implications are known to landowners, developers and communities.

The Action Programme must contain greater financial detail on deliverability of infrastructure projects. Action Programme omits reference to the importance of the delivery of new schools provision within City of Edinburgh to deliver the LDP. Must be empirically tested to demonstrate need and costed so that certainty of delivery and cost implications are known to landowners, developers and communities.

Land constraints should be taken account of in relation to density of development and land use planning e.g. pylons and past mine workings. The interface with transport links and road structures should take account of local authority areas and strategic planning at an early stage. Lack of joined up approach to strategic funding arrangements necessary to deliver the development strategy in the Plan. No clear and coherent delivery strategy in the Plan to enable infrastructure to remove development constraints particularly for education provision.

The representation indicates this is of particular importance for education within the City of Edinburgh Council area, specifically Newcraighall.

Denholm and District Community Council (040612)

Need for housing but must consider location as small communities do not have infrastructure and services to support it.

Dunbar Community Council (790195)

Concerns Dunbar's infrastructure and local services will be unable to cope with 1200 additional homes. Concerns that congestion will increase with only limited routes crossing the railway line which bisects the town. Concerns that extensions to schools, whilst paid for by development, do not pay for additional teachers and result in loss of playing fields. Would like more information on this. Enhancements will be required to strategic waste water assets to bring forward development. Health services stretched and at capacity. Developers do not contribute to this. Needs to be provision within Dunbar for end of life care, sheltered housing and nursing homes when there is a growing ageing population.

H and H Group Plc (927998)

In addition to housing, infrastructure delivery is a key priority which needs to be addressed. Encouraged that in relation to West Lothian issues surrounding infrastructure and in particular education provision is highlighted but consider there should be guidance on how infrastructure is to be addressed at strategic and local level.

Homes for Scotland (040551)

Inadequate reference in the Proposed Plan to analysis / demand on secondary schools required to meet future housing land allocations.

Mrs Jane Kellock (039869)

Requirement for over 8,000 homes in West Lothian needs to be built in tandem with health care provision.

Mactaggart and Mickel Homes (038949)

Consider that more emphasis should be placed on infrastructure challenge and that the Proposed Plan should go further in offering support to allocated sites where there are infrastructure constraints and must give clear direction to all stakeholders. Emerging Plan should place greater emphasis on a new delivery mechanism as set out in the Review of the Planning System materialising.

Mrs Mirabelle Maslin (928549)

Considers that the Proposed Plan must include a commitment that Government will

ensure that money is made available to pay for the necessary infrastructure. Significant difficulties in maintaining upgrading and creating infrastructure. Transport infrastructure oversubscribed. Provision of medical services for large increases in population not mentioned in the plan and services are overloaded. Education provision hardly mentioned.

NHS Lothian Public Health and Health Policy (840024)

Imperative that investment in health and social care infrastructure is included in partnership discussions. Any housing developments should not be approved until Integration Joint Boards and Health and Social Care Partnerships have been part of the decision making process.

North Dunfermline Community Councils and Halbeath TRA (930297)

Commitment must be made to put the required infrastructure in place before housing is built. Expansion, such as in Dunfermline, has been let down by lack of infrastructure being in place including education, health, recreation and youth facilities and social services.

Traffic congestion has significantly increased and air quality has decreased. Public transport has also become overcrowded. Proposed Plan must focus on delivery of infrastructure to ensure the housing the plan demands be built is supported. Whilst support is given to necessary housing where it can be justified, concerned that SESplan partners and Scottish Government are leaving market forces to address infrastructure. Recent state funded infrastructure has failed to deliver optimum performance due to cost restrictions. Strategic infrastructure must be delivered in a timely manner to support any further expansion in Dunfermline.

Mrs Gail Reid (035887)

Communities are constantly changing with insufficient infrastructure and services, and out of control traffic growth.

Rosewell and District Community Council (790523)

Accommodating this scale of growth will lead to even more difficulty to service this increase in population with overstretched services. Development should integrate with shops and services.

Mr Julian Siann (024823)

Nothing in Proposed Plan on social services provision. Pressures on medical practices, schools and community facilities. Housing must go hand in hand with more community provision and this should be stated as an objective in the Plan.

Wallace Land Investment and Management (930071)

Inadequate reference in the Proposed Plan to analysis / demand on secondary schools required to meet future housing land allocations.

Winchburgh Developments Ltd (832800)

Education is a strategic matter and should be dealt with by the Strategic Development Plan. Stating that actions relating to education may be considered strategic but are dealt with in Local Development Plan Action Programmes is wrong. Failure to deliver education provision will result in a failure to deliver the

scale of house building required.

Object to the omission in the Action Programme of reference to the delivery of new schools provision as a strategically important issue in delivery of Winchburgh. New non-denominational and denominational schools are required to address secondary school education capacity shortfalls that affect the entire east of West Lothian. It is unreasonable to expect new development to pay for all schools in advance.

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

##### Builyeon Farms LLP (835897)

Add new section after Section 3 in the Proposed Plan containing clear, costed funding and delivery strategy, with a separate, additional cost plan for individual projects.

Action Programme to be revised in relation to the provision of infrastructure, in particular, education and the approach to funding.

After 'existing infrastructure' in paragraph 3.1 add 'Strategic Development Plan planning authorities will, individually, actively enable the funding and delivery of new infrastructure, including new schools provision, in growth areas to meet Scottish Planning Policy requirements and Scottish Government housing targets'.

##### CALA Management Ltd (929806)

Plan should set out level of strategic infrastructure required, including Education, and the mechanisms in place to deliver them. Add new section 3 to Action Programme, or separate supporting document that sets out a clear and costed funding and delivery strategy and a standalone costing plan detailing individual strategic projects to be agreed in advance with the development industry.

Paragraphs 2.3 and 2.4 (City Region Deal) should be altered to make reference to potential and financial importance of a City Deal in delivering infrastructure.

##### Cramond and Barnton Community Council (803443)

LDPs should consider the adequacy of essential public services (e.g. GP services) to service residents' needs.

##### The Trustees of Sir C M Dalrymple (835899)

Add new section after Section 3 in the Proposed Plan containing clear, costed funding and delivery strategy, with a separate, additional cost plan for individual projects. Revision of the Action Programme in relation to the provision of infrastructure, in particular, education and the approach to funding.

##### H and H Group Plc (927998)

Modify the Vision to include more specific guidance on infrastructure provision. Include guidance on how infrastructure is to be addressed at strategic and local level.

##### Homes for Scotland (040551), Wallace Land Investment and Management

(930071)

No modifications specified, representation indicates include reference in the Proposed Plan to analysis / demand on secondary schools.

Mrs Jane Kellock (039869)

No modifications specified, representation indicates requirement for over 8,000 homes in West Lothian need to be built in tandem with health care provision.

Mactaggart and Mickel Homes (038949)

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

NHS Lothian Public Health and Health Policy (840024)

Add new final sentence to Paragraph 6.3 to extend the requirement to provide infrastructure to include community facilities notably a hall or community meeting place.

Mrs Gail Reid (035887)

No modifications specified, representation indicates development should be stopped until sufficient transport, pedestrian, services (education and medical) and infrastructure is provided.

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

##### **The Vision**

H and H Group Plc (927998)

SESplan disagree that the vision needs modifying to include more specific guidance on infrastructure provision. The role of the SDP is to provide direction to LDPs in the city region. This includes the delivery of strategic and cross-boundary transport infrastructure. However, it is the responsibility of individual local authorities to identify the impact of development within their area on non-strategic infrastructure, such as education or GP surgeries and no direction on this matter is required within the SDP. **No modification proposed.**

##### **Non transport infrastructure – funding and delivery strategy**

Builyeon Farms LLP (835897), CALA Management Ltd (929806), The Trustees of Sir C M Dalrymple (835899), Mrs Mirabelle Maslin (928549)

Education infrastructure is the responsibility of individual local authorities and is therefore not a strategic or cross-boundary requirement as identified by paragraph 2.2 of the Proposed Plan. Unless catchments cross authority boundaries, SESplan member authorities are not required to work together to deliver new schools. The impact of development on education infrastructure is dependent on the direct or cumulative impact of housing growth on individual Local Authorities education estates. It is the responsibility of individual LDPs and their respective Action Programmes to set policy for assessing the impact of development on infrastructure, and to set out mechanisms for delivery. **No modification proposed.**

The role of the Edinburgh and South East Scotland City Deal in funding infrastructure has not yet been agreed. Therefore it would not be appropriate to set out any commitments at this stage. **No modification proposed.**

Builyeon Farms LLP (835897), Mrs Gail Reid (035887), Mactaggart and Mickel Homes (038949)

Where it is identified that new development will have an impact on infrastructure it is the responsibility of the developer to ensure that this impact is mitigated. It is not the responsibility of individual local authorities to fund the mitigation of new development, or fund in advance of development. **No modification proposed.**

North Dunfermline Community Councils and Halbeath TRA (930297), Mrs Mirabelle Maslin (928549)

Development is required to deliver necessary infrastructure alongside development. Individual authorities assess local development infrastructure requirements, including health, education and transport. **No modification proposed.**

### **Education – Secondary Schools**

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

SESplan disagree that there should be a reference in the Proposed Plan to analysis / demand on secondary schools. Education infrastructure is the responsibility of local authorities and is therefore not a strategic or cross-boundary requirement as identified by paragraph 2.2 of the plan. **No modification proposed.**

### **Site specific Education – Winchburgh**

Winchburgh Developments Ltd (832800)

Requirements for the developer of the new school are set out in the planning consent and supporting Section 75 Agreement. The delivery of the new school is to be at developer expense. Action Programmes for each of the LDPs set out requirements for education and other infrastructure. **No modification proposed.**

### **Healthcare and Community Facilities**

Mrs Jane Kellock (039869), Cramond and Barnton Community Council (803443), Dunbar Community Council (790195), Mr Julian Siann (024823)

It is the responsibility of individual LDPs and their respective Action Programmes to set policy for assessing the impact of development on healthcare infrastructure working with community planning partners. LDPs and Action Programmes will set out the mechanisms for delivery of any required identified healthcare infrastructure, ahead of, or part of new development. **No modification proposed.**

NHS Lothian Public Health and Health Policy (840024)

Infrastructure associated with new development needs to meet the tests of Circular 3/2012, in that it is essential to mitigate the impact of development. These needs are best assessed at the local level. Therefore it is not for SESplan to set such requirements. **No modification proposed.**

### **Other Issues**

Denholm and District Community Council (040612)

Housing site selection is undertaken during LDP preparation and this includes analysis of infrastructure. **No modification proposed.**

Dunbar Community Council (790195)

SESplan does not set out a requirement for 1,200 additional houses in Dunbar. Dunbar specific matters are more appropriately addressed in East Lothian LDP. **No modification proposed.**

Mr Julian Siann (024823)

Social services is not a matter for a Strategic Development Plan. **No modification proposed.**

Rosewell and District Community Council (790523)

Representation noted. **No modification proposed.**

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]