

Issue 17	Other Issues	
Development Plan reference:	Other/miscellaneous issues	Reporter: [Note: For DPEA use only.]
Body or person(s) submitting a representation raising the issue (including reference number):		
Mr George Adam (037603) Aithrie Estates (032643) Builyeon Farms LLP (835897) Mr Andrew Carnduff (035138) CALA Management Ltd (929806) A J C Clark (930956) Cockburn Association (037249) Corstorphine Community Council (040316) The Trustees of Sir C M Dalrymple (835899) Edinburgh Association of Community Councils (040476) Gladman Scotland (783418) Grange and Prestonfield Community Council (790304) Homes for Scotland (040551) Juniper Green Community Council (028859) Liberton and District Community Council (790396) Mrs Mirabelle Maslin (928549) Mr Colin McGrath (790749) Midlothian Green Party (790754) Murray Estates (930087) Moorfoot Community Council (906008)	National Trust for Scotland (040626) Network Rail (928260) NHS Lothian Public Health and Health Policy (840024) North Berwick Community Council (035522) Persimmon Homes (040349) Police Scotland (040584) Prestonpans Community Council (039835) RSPB Scotland (031480) Mrs Gail Reid (035887) Royal Yachting Association (870419) Scottish Enterprise (790575) Scottish Environmental Protection Agency (790577) Scottish Natural Heritage (790587) Scottish Water (035737) Shawfair LLP (039940) Shell UK Ltd (832992) South West Communities Forum (805601) Stewart Milne Homes (930082) Taylor Wimpey and Barratt Homes (040609) Winchburgh Developments Ltd (832800)	
Provision of the Development Plan to which the issue relates:	Other plan issues raised	
Planning Authority's summary of the representation(s):		
<u>Mr George Adam (037603)</u> The timescales for items 29 to 31 in the Action Plan are too far in the future and will only result in major problems for school infrastructure in Winchburgh (houses not selling because no transport) and blocking house building in Linlithgow (no school capacity). <u>Aithrie Estates (032643)</u>		

Action Programme Action point No 29 is inaccurate regarding the proposed new rail station at Winchburgh. It is inaccurate to describe the proposed station as being required to support the ongoing development of the 'Winchburgh CDA' as any obligations regarding the rail station are obligations relevant to the whole CDA. The £10m required to be 'developer funded' is not accurate. The facility may not be funded wholly by a developer. The cost is not known. Delivery of the rail station is in Phase 2 and reaching that phase is dependent on clarification of the funding mechanism for the new secondary school Action Point 30. Regarding the new Winchburgh M9 junction contains errors regarding cost and timescale. A cost of £25m is disputed. The timing is dependent on Phase 2 being triggered and thereafter determined by 1,000 residential homes being occupied.

Builyeon Farms LLP (835897)

Insufficient information in Action Programme on funding opportunities and progress on delivery by Local Authority area or strategic infrastructure topic. List of projects with limited supporting information not enough.

Mr Andrew Carnduff (035138)

Plan does not include reference to harbours and coastline which are important for the economy, quality of life and tourism. The regions coastline and harbours provide access for trade, commerce, sport and recreation and have been the basis for history and culture. Marine-based economy requires particular inclusion within the plan. Sea coast assets including harbours, piers and wharves should be identified in the plan and local authorities directed to recognise, identify, protect and develop them. Sea coast should also be protected for wildlife as a continuous strip. Marine interface is a cross-boundary contributor to the economy. Individual elements of the coastline are attributed disparately to different sections of the plan. Request that a cluster be identified for sea coast activity and related onshore activities. This could include tourism, ferries, wildlife watching, nature conservation, yacht cruising, long distance walking routes etc.

CALA Management Ltd (929806)

Insufficient information in Action Programme on funding opportunities and progress on delivery by Local Authority area or strategic infrastructure topic. List of projects with limited supporting information not enough. Actions relating to Winchburgh are wrong regarding costing and timing of infrastructure. This could be resolved through a new section 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. It is not clear from the document what the strategic policies, proposals and recommendations are within the Plan. Simply bolding text is considered insufficient and vague.

A J C Clark (930956)

SDP2 should be set aside while a comprehensive assessment is made on the impact of Brexit.

Cockburn Association (037249)

No reference in Plan to the visitor economy. Existing cultural assets and historic sites in and around Edinburgh should be protected from excessive development.

Development should not detract from natural environment and should add interest. Encourages the spread of cultural assets throughout the city.

Format of response for Proposed Plan confusing.

Figures difficult to interpret and graphics faint.

Corstorphine Community Council (040316)

Action programme: disappointed that routes may not be delivered to 2030. Non-car travel should be prioritised and has high cost/benefit ratios.

The Trustees of Sir C M Dalrymple (835899)

Insufficient information in Action Programme on funding opportunities and progress on delivery by Local Authority area or strategic infrastructure topic. List of projects with limited supporting information not enough.

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

SDP system is inflexible and cannot adapt to changing economic and governmental decisions. There is a need for 'a flexible ability' in the plan to respond and consider the impacts of change in a speedy manner.

Gladman Scotland (783418)

Annual Housing Land update (May 2015) is an apology for failing to deliver the housing requirements of SDP1 by stating delivery rates are unachievable. The tone of the Annual Housing Update seems designed to allow member authorities to "give up" on the, admittedly challenging, SDP1 housing land requirements and to just "Get-by" until the lower housing land requirements of SESplan 2 come into effect in 2018.

Homes for Scotland (040551)

Alternative Housing Supply Targets (HSTs) have not been assessed. Nowhere in the Environmental Report (ER) is there an analysis of the environmental implications of implementing the Wealth Distribution HNDA estimates in full. Same applies to setting the Edinburgh HST. ER provides no analysis of environmental implications of a higher generosity margin. (Taken from Homes for Scotland Appendix 4 – RSD15).

Juniper Green Community Council (028859)

Fairness needs to be inserted into the planning system by removing the option for repeated appeals and by listening to community concerns.

Liberton and District Community Council (790396)

Timescales for the proposed engagement need to be set now and before the next Local Development Plan.

Mrs Mirabelle Maslin (928549)

Monitoring/implementation - how can it be ensured that the Plan's requirements are not weakened or left unmet by Local Authorities? No, or inadequate, monitoring takes place leading to poor development strategies. This is true of developments in

Midlothian where weak approaches by Local Authorities has resulted in lack of greenspace and lack of developer contributions. 5 year plan updates are of limited value. Reviews should include possibility for a period delaying, slowing down or suspending growth. Should take time to deal with 'backlog' of issues. Local Authorities will not always be able to meet criteria.

Six week consultation period is insufficient.

Glossary - definitions required for: City Region, A701 relief road and A702 link.

Mr Colin McGrath (790749)

Looks for Scottish Borders to have its own separate Vision. Seeks for better and more effective means of engagement and consultation.

Midlothian Green Party (790754)

Support the early involvement of communities in the design of new developments and the alignment of LDPs with community plans. However this will require increased resources devoted to facilitating communities to engage.

Murray Estates (930087), Persimmon Homes (040349), Stewart Milne Homes (930082), Taylor Wimpey and Barratt Homes (040609)

Should use named policies rather than bold text, given plan's statutory function.

Moorfoot Community Council (906008)

Unclear what has changed in the Plan since the Main Issues Report making it difficult to comment on. Should set out what has changed and whose comments led to those changes.

Network Rail (928260)

Suggests introduction of Notification Zones for new development close to all operational railway infrastructure and strategic guidance to avoid development.

National Trust for Scotland (040626)

Only limited treatment of culture, heritage and associated tourism in the Plan. This is a significant sector for the region's economy. Recommend Plan incorporates findings of the Environmental Report on this issue.

Limited relationship between SDP and LDPs, need to articulate how local planning will combine with regional planning and whether cross-boundary solutions can be developed.

NHS Lothian Public Health and Health Policy (840024)

Consultation Portal should be simplified. Responding across three sections of the consultation and sub-sections within these chapters is at odds with the approach to joined-up public policymaking that is required.

North Berwick Community Council (035522)

Concerned plan does not address coastal erosion. This is an oversight particularly in relation to North Berwick. Sewage system vulnerable.

Police Scotland (040584)

Police Scotland Fife Division will require to prepare for a number of factors likely to impact on policing including: Community engagement, cultural issues, cultural requirements and language issues; Recruitment Policy to consider diverse communities we serve; Crime trends targeting vulnerable members of our communities; Impact on existing custody arrangements and care provision in place; Continual evaluation of the service being provided by Fife Division, to ensure the high standards currently being received continue for expanding communities. This will involve effective resourcing, the streamlining of processes and ensuring value for money in the current financial climate; and Development of the working practices of Fife Division with partner agencies to ensure that we are effective in dealing with the evolving demographics within Fife. The opening of the Queensferry Crossing will likely have an impact on demand in respect of vulnerable missing persons and those presenting as suicidal, with the Forth Road Bridge currently a site of concern. Police Scotland is currently in the process of considering a 10-year-strategic forecast under the auspices of the Policing 2026 programme. The work being undertaken by the Policing 2026 programme considers the themes of the SESplan proposal by carrying out long term horizon scanning and prioritising potential impacts.

Prestonpans Community Council (039835)

Plan makes no reference to Scottish Planning Policies, nor to designations other than Green Belt.

Mrs Gail Reid (035887)

Consultation process confusing, complicated and overly technical. Form is complicated asking for opinion and solutions. Consultation process requires substantial time and technical knowledge making it hard to engage. Public consultation events should be more frequent with more varied times.

RSPB Scotland (031480)

Plan lacks recognition that change needs to be delivered with nature and low carbon options in mind, options should consider the potential impacts on protected areas and important local populations of species.

Royal Yachting Association (870419)

No reference is made to the National Marine Plan in the Proposed Plan including coordination with terrestrial planning. There are also issues to do with protecting coastal infrastructure, such as harbours and marinas from coastal erosion, sea level rise and storm surges.

Scottish Enterprise (790575)

Action Programme should more clearly reflect that much of the key infrastructure investment delivery and implementation at this juncture relies quite heavily, and is dependent on, City Deal.

Scottish Environmental Protection Agency (790577)

Proposed Plan should make reference to the 11 Air Quality Management Areas in West Lothian, Fife, Edinburgh and East Lothian. SESplan Action Programme should set out actions aimed at reducing levels of pollution.

Scottish Natural Heritage (790587)

National Marine Plan gives spatial steer for port and land based infrastructure for offshore renewables and carbon capture and storage network. This could be included in Action Programme under actions 3 and 4. SESplan could direct Local Authorities to work with Marine Scotland to develop a more detailed strategy for marine/coastal issues to give offshore developers and investors more certainty.

HRA - consider that some discussion on the outcome of the screening process for in-combination effects is required and recommend that the post-examination update includes this. SESplan's role should be in setting what a range of suitable mitigation measures would be for Local Development Plan HRAs and these should be restated for SDP2.

Update Action Programme to take account of linked active travel and transport projects including Orbital Bus and Orbital Cycle Route and A801 Improvements.

Scottish Water (035737)

Supports general approach of the Strategic Flood Risk Assessment but recommend that the definition of sewer flooding is updated to be more in line with the SEPA definition.

Shawfair LLP (039940)

Proposed Plan should place greater emphasis on a new delivery mechanism as set out in the Review of the Planning System materialising. 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.

Shell UK Ltd (832992)

Should identify and safeguard oil and gas pipelines in line with SPP paragraph 99 which requires Strategic Development Plans to identify nationally important clusters of industries handling hazardous substances and safeguard these from development which could compromise their continued operation or expansion. Paragraph 107 of SPP also requires developments to take into account potential impacts on major-accident hazard sites. The Proposed Plan should accord to both of these and requirements of Planning Circular 3/2015: Planning Controls for Hazardous Substances (RSD16) and European Directive 2012/18/EU (RSD17). Oil and gas pipelines should be considered a strategic cross-boundary issue, particularly considering their impact on the economy.

South West Communities Forum (805601)

Add definition of World Heritage Site to the Glossary.

All growth options in Strategic Environmental Assessment show negative impacts including promoting unsustainable development and lack of regard for future food production. Climate change issues are not being considered.

Winchburgh Developments Ltd (832800)

Reference to Winchburgh Rail Station in the Proposed Plan Action Programme

(point 29) being wholly developer funded is incorrect. Funding could come from others sources e.g. Scottish Government Station Fund. Winchburgh Developments Ltd. should be listed as the developer. The timescale for the Winchburgh M9 Junction in the Proposed Plan Action Programme (point 30) is wrong. Timescale should be in the next five years. Costs for delivery of junction improvements are incorrect and do not compare to Winchburgh Developments Ltd.'s costings. Improvements required are limited to two new roundabouts/slip roads at a location with grade separation already in place. Winchburgh Developments Ltd. should be listed as the developer. Action point 28, in relation to park and ride sites lacks credible financial information and double counts Winchburgh works in points 29 and 30.

Modifications sought by those submitting representations:

Mr George Adam (037603)

No modification specified, however, representation indicates Action Programme points 29 – 31 timescales be revised as they are too far in the future.

Aithrie Estates (032643)

Amend Action Programme points 29 and 30 to show more accurate information.

Builyeon Farms LLP (835897)

No modifications specified, however response implies revision of the Action Programme in relation to the provision of infrastructure, in particular, education and the approach to funding.

Mr Andrew Carnduff (035138)

Marine-based economy requires particular inclusion within the plan. Sea coast assets including harbours, piers and wharves should be identified in the plan and local authorities directed to recognise, identify, protect and develop them. Sea coast should also be protected for wildlife as a continuous strip. Request that a cluster be identified for sea coast activity and related onshore activities.

At para. 4.8 and 9, insert: 'More than 50 former small commercial or fishing harbours offer current and developable opportunity for use in sport, recreation, tourism and in smaller marine service provision'.

Glossary definitions - Blue Infrastructure should additionally include 'the Firth of Forth, the sea, and their adjacent coastal margins'. Green Belt should have inserted "and coasts". Green Infrastructure should have inserted 'sea and coastal margins'. In the Infrastructure definition, the word 'harbours' should be inserted before ... etc.

CALA Management Ltd (929806)

Add new section 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.

The presentation of the Plan must be clearer in its policy framework – simply bolding text is considered insufficient and vague. Paragraphs 2.1 and 2.2 should be amended to clearly set out policies and proposals.

A J C Clark (930956)

Work on SDP2 should be suspended while a comprehensive assessment is made on the impact of Brexit.

Cockburn Association (037249)

No modification specified, representation indicates a simpler form of consultation response should be used, similar to that used for responding to the Main Issues Report.

Corstorphine Community Council (040316)

Modify timescales in the action programme to shorten delivery times for active travel routes.

The Trustees of Sir C M Dalrymple (835899)

No modifications specified, response implies revision of the Action Programme in relation to the provision of infrastructure, in particular, education and the approach to funding.

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

SDP should have in-built flexibility which could take account of change and cascade this to development and infrastructure priorities.

Juniper Green Community Council (028859)

No modification specified, representation indicates that fairness needs to be inserted into the planning system by removing the option for repeated appeal and by listening to community concerns.

Liberton and District Community Council (790396)

Timescales for the proposed engagement need to be set now and before the next LDP.

Mrs Mirabelle Maslin (928549)

Add: City Region, A701 relief road, A702 link to glossary.

Mr Colin McGrath (790749)

Scottish Borders to have its own separate Vision. Seeks for better and more effective means of engagement and consultation.

Midlothian Green Party (790754)

Support the early involvement of communities in the design of new developments and the alignment of LDPs with community plans. However, this will require increased resources devoted to facilitating communities to engage.

Murray Estates (930087), Persimmon Homes (040349), Stewart Milne Homes (930082), Taylor Wimpey and Barratt Homes (040609)

Should use named policies rather than bold text, given plan's statutory function.

Moorfoot Community Council (906008)

Not clear what has changed in the Plan since the Main Issues Report making it difficult to comment on. Should set out what has changed and whose comments led to those changes.

National Trust for Scotland (040626)

Economy: Recommend Plan incorporates findings of the Environmental Report on culture, heritage and associated tourism. Need to articulate more clearly how local planning will combine with regional planning and whether cross-boundary solutions can be developed.

Network Rail (928260)

Level Crossings - no modification specified, representation indicates that the Plan should provide strategic guidance for LDP spatial strategies to avoid allocating development required to use level crossings.

Notification Zones - no modification specified, representation indicates that the Plan should provide a strategic context for LDPs to provide a designated notification zone around all operational railway infrastructure within which any development application proposals would be notified to Network Rail. This would be similar to oil and gas pipeline policy.

NHS Lothian Public Health and Health Policy (840024)

No modification specified, representation indicates a more streamlined way of consultation and responding to the plan would be beneficial.

North Berwick Community Council (035522)

Should include consideration of the issue of coastal erosion. We would like to see a commitment from all authorities in the SES region to developing creative and innovative ways to protect our coastline.

Prestonpans Community Council (039835)

Should acknowledge the value of designations and policies which are there to protect Listed Buildings and their wider settings, Conservation Areas, Battlefield Sites, prime agricultural land and more should be explicitly mentioned.

Mrs Gail Reid (035887)

Consultation process needs to be streamlined/simplified to make it easier and less time consuming to engage. Public consultation events should be more frequent with varied times.

RSPB Scotland (031480)

Add reference to the need to consider impacts on nature and protected areas.

Royal Yachting Association (870419)

No modification specified, representation implies plan should be modified to include reference to the National Marine Plan.

Scottish Enterprise (790575)

Action Programme should more clearly reflect that much of the key infrastructure investment delivery and implementation at this juncture relies quite heavily, and is

dependent on, City Deal.

Scottish Environmental Protection Agency (790577)

Should make reference to the 11 Air Quality Management Areas in West Lothian, Fife, Edinburgh and East Lothian.

Action Programme should be used to establish a requirement that only buses with the highest EURO specification or zero emissions technology should be used on busy commuter routes, in order to alleviate air pollution in urban areas.

Scottish Natural Heritage (790587)

Action Programme: National Marine Plan gives spatial steer for port and land based infrastructure for offshore renewables and carbon capture and storage network. This could be included in Action Programme under actions 3 and 4. Update to take account of linked active travel and transport projects including Orbital Bus and Orbital Cycle Route and A801 Improvements.

Coast/Marine: SESplan could direct Local Authorities to work with Marine Scotland to develop a more detailed strategy for marine/coastal issues to give offshore developers and investors more certainty.

Scottish Water (035737)

Amend section 1.8 of Strategic Flood Risk Assessment to 'Sewer flooding is often closely linked to surface water flooding, and may contain untreated foul water'.

Shell UK Ltd (832992)

Should set out a policy to recognise and safeguard oil and gas pipelines as a strategically important transportation facility and guide any proposed development near the existing pipelines which run through the SESplan area. Policy should provide strategic locational guidance for any new development proposed near existing pipelines and reference Health and Safety Executive Planning Advice for Developments near Hazardous Installations Guidelines (RSD18). Request that new or expanded strategic development allocations are subject to appropriate assessment and full recognition given to existing oil and gas pipelines.

South West Communities Forum (805601)

Add definition of World Heritage Site to the Glossary.

Winchburgh Developments Ltd (832800)

Add additional point to Action Programme as follows:

Winchburgh non-denominational secondary school provision

Action Point XX - Winchburgh secondary school delivery.

Delivery Action - to co-fund delivery of new non-denominational and denominational secondary school provision at Winchburgh to enable the implementation of the Development Plan housing strategy for the eastern sector of West Lothian Council.

Timescale - 2016-2020.

Leads and Partners' West Lothian Council, Scottish Government, Winchburgh Developments Ltd, third party investors and developers.

Costs and funding - estimated at £21m for Phase 1 secondary school provision.

Progress - Action required immediately.

Summary of responses (including reasons) by Planning Authority:

Action Programme

Mr George Adam (037603), Builyeon Farms LLP (835897), Aithrie Estates (032643), CALA Management Ltd (929806), Corstorphine Community Council (040316), The Trustees of Sir C M Dalrymple (835899), Scottish Enterprise (790575), Scottish Natural Heritage (790587), Winchburgh Developments Ltd (832800)

The SESplan Action Programme is prepared in line with Scottish Government requirement for Action Programmes. It focuses on national, regional and cross boundary matters, the latter of which requires more than one of the SESplan authorities to work together to deliver it. All other infrastructure and delivery matters will be addressed in individual LDP Action Programmes, including the delivery of secondary schools.

Page 3 of the Action Programme sets out the development process. It is accepted that information will change over time, including the detail on City Deal related programmes. Comments on action programme content will be reviewed when the updated Action Programme produced within three months of plan approval (expected May 2018). Timescales of many projects are currently not yet identified and therefore the default of 2018-2030 has been used. **No modification proposed.**

Scottish Environment Protection Agency (790577)

Specification of buses is a matter for SEStran, transport providers and individual authorities, not the Strategic Development Plan. **No modification proposed.**

Consultation, Engagement and Process

Cockburn Association (037249), Juniper Green Community Council (028859), Liberton and District Community Council (790396), Mrs Mirabelle Maslin (928549), Mr Colin McGrath (790749), Moorfoot Community Council (906008), NHS Lothian Public Health and Health Policy (840024), Mrs Gail Reid (035887), Midlothian Green Party (790754)

The Proposed Plan (2016), Main Issues Report (2015) and early Influence the Plan (2014) presented opportunities for all stakeholders to engage and influence the preparation of the second Strategic Development Plan at different stages. They also provided different means to engage including surveys, workshops, drop-in sessions and presentations. During the Main Issues Report a substantial number of events took place across the region at different times of the day.

SESplan sets out in an annual Development Plan Scheme (DPS) a Participation Statement stating how the SDPA will ensure there are opportunities for all stakeholders to participate in the plan preparation. The DPS also sets out a timetable for key documents and their consultation.

The consultation on the Proposed Plan met the statutory timescales as set out by the Scottish Government and it is considered that opportunities have been made throughout the process for engagement in the plan's preparation.

The format of responding to issues and proposing modifications at Proposed Plan

stage are also requirements set out by the Scottish Government. This process is followed to ensure there is a formal means for responding to and taking account of comments where relevant.

The Main Issues Report is not in itself a proposed plan. It sets out options and preferred options for the direction and content of a proposed plan, therefore, a list of changes between the two documents would not be well-matched. Comments on the MIR were reported to SESplan's Joint Committee in December 2015 and informed development of the proposed plan.

Engagement in LDP preparation is a matter for member authorities.

5 year plan updates are in line with requirements of SPP.

The process of appeals on planning applications is set out by the Scottish Government and SDP cannot alter this process, however an up to date development plan has the ability to give greater certainty on the outcome of appeals. **No modification proposed.**

Plan policy

CALA Management Ltd (929806), Murray Estates (930087), Persimmon Homes (040349), Stewart Milne Homes (930082), Taylor Wimpey and Barratt Homes (040609)

Disagree with proposed modification. The Proposed Plan has made a deliberate shift away from the 15 named policies contained in SDP1. This was an intentional move to make SDP2 more accessible and readable for all users and give the entire document greater relevance. Member authorities and decision makers are required to give due consideration to all provisions of a statutory development plan, not just named policies or policy direction in bold. However, clear, specific directions to member authorities and LDPs have been highlighted throughout the plan in bold in the interests of clarity. LDPs have to comply with SPDs. **No modification proposed.**

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

Note the response. To ensure that the plan is kept up to date, it must be reviewed within four years of its approval. The Action Plan will be reviewed by the SDPA every two years. **No modification proposed.**

Network Rail (928260)

SESplan note the response but would consider any new or emerging policy on notification zones requires to be designed and implemented at a national policy level, in the interests of consistency given the cross boundary nature of the rail network. It is not the role of the SDP to examine this specific detailed level of policy. **No modification proposed.**

Prestonpans Community Council (039835)

The plan is intended to be a concise, visionary, map based document which identifies key areas for growth and locations for investment. The plan is prepared based on the requirement of SPP, NPF3 and relevant legislation. SDP are not

required to repeat national policy already contained in SPP. Specific details on Green Belt are considered a matter for LDPs to address, in conjunction with National Planning Policy, local landscape designations and relevant supplementary guidance where applicable. Strategic Environmental Assessments/Habitat Regulations Assessments will also be used where appropriate to assess environmental impacts of specific proposals. The Placemaking section of the plan contains a clear directive in relation to agricultural land. **No modification proposed.**

Mr Andrew Carnduff (035138), Royal Yachting Association (870419), Scottish Natural Heritage (790587)

Disagree with proposed modification. SESplan is intended to be a concise, visionary, map based document. The Proposed Plan reflects SPP and the NPF. NPF3 states that National and Regional Marine Plans should also be taken into account where relevant and SESplan recognise that consistency will be important in this and future plans between marine and terrestrial plans. Ports and Harbours are also identified in the Proposed Plan in Table 4.1 Significant Business Clusters. **No modification proposed.**

Shell UK Ltd (832992)

Disagree with proposed modification. The plan is intended to be a concise, visionary, map based document which identifies key areas for growth and locations for investment. It is not the role of SDP to repeat other requirements and legislation. New development proposals will continue to be assessed at LDP level, in line with National Planning Policy, local landscape designations and relevant supplementary guidance where applicable. Strategic Environmental Assessments/Habitat Regulations Assessments will also be used where appropriate to assess environmental impacts of specific proposals. **No modification proposed.**

National Trust for Scotland (040626)

Disagree with proposed modification. The NPF clearly sets out how local planning combines with regional planning. There are numerous examples of strategic cross-boundary projects which can be drawn upon for best practice examples. Action Programmes are also instrumental in supporting cross boundary initiatives. **No modification proposed.**

Environment

North Berwick Community Council (035522)

Disagree with proposed modification. LDPs will continue to recognise and utilise international, national and local natural heritage designations to conserve and protect the natural environment. Coastal erosion is also covered by other legislation, therefore unsure as to what value would be added by adding this to the Proposed Plan. Sewage systems are the responsibility of developers and Scottish Water. **No modification proposed.**

RSPB Scotland (031480)

Disagree with proposed modification. This is considered a matter for LDPs to address, in conjunction with National Planning Policy, local landscape designations and relevant supplementary guidance where applicable. Strategic Environmental

Assessments/Habitat Regulations Assessments will also be used where appropriate to assess environmental impacts of specific proposals. **No modification proposed.**

Scottish Environmental Protection Agency (790577)

Disagree with proposed modification. Table 3.1 of the Environmental Report (October 2016) references the Air Quality Management Areas. This has informed the Spatial Strategy for SDP2 which seeks to promote modal shift, sustainable travel, active travel alternatives and a reduction in CO₂ emissions. The Proposed Plan reflects SPP and NPF3, including a commitment to reducing transport related emissions. However, there is currently no obligation for a Strategic Development Plan to contain targets relating to emissions. **No modification proposed.**

Scottish Water (035737)

The Strategic Flood Risk Assessment has been updated as part of the submission of the Proposed Plan. **No modification proposed.**

Glossary definitions

Mr Andrew Carnduff (035138)

Disagree with proposed modifications. SESplan do not support suggested additions to Glossary definitions. **No modification proposed.**

Mrs Mirabelle Maslin (928549)

Disagree with proposed modification. SESplan do not consider there is a requirement to add the terms 'City Region', 'A701 relief road', or 'A702 link' to the glossary. Terms are considered self-explanatory. **No modification proposed.**

South West Communities Forum (805601)

Disagree with proposed modification. SESplan do not consider there is a requirement to add the terms 'World Heritage Site' to the glossary. The term is considered sufficiently well used and self-explanatory – it is not considered so technical or specialised that a glossary definition is required. **No modification proposed.**

Strategic Environmental Assessment

Homes for Scotland (040551)

Environmental Assessment is required to assess reasonable alternatives. The full Wealth Distribution estimate is not a reasonable alternative as a HST. This is because it is not a deliverable HST due to the level of funding to deliver affordable housing (reasoning set out in the Housing Background Paper and Issue 8 S4). As the combined HST is short of the HNDA estimate, the HST is set at the maximum, reasonable and deliverable level within resources to deliver the plan.

Regarding alternative Edinburgh HSTs, the alternative spatial strategies considered in the Interim Environmental Report (IER) has different housing land take impacts for the SESplan Member Authorities - See appendix D of IER and now ER. Option 1A for City of Edinburgh required significant additional new housing land supply above that required by the Proposed Plan HST. This identified that there would be significant negative impacts on the following SEA objectives: Protect and enhance natural heritage assets; Protect and enhance the landscape

and townscape; To use resources sustainably; To minimise the impacts on soil quality and adhere to contaminate land regulations; and Minimise flood risk and adverse significant effects on water bodies. Therefore whilst the numbers do not exactly match the scale of housing in the Wealth Distribution estimate, higher HSTs for City of Edinburgh have been assessed.

The generosity margin does not require assessment in the ER as it relates to providing land for the HST to be met. It is not to provide additional housing above the HSTs to be built. Therefore the realised impacts between 20% and 10% margins would not be different unless less suitable sites were required to be identified due to need to have greater land supply due to higher generosity margin. **No modification proposed.**

South West Communities Forum (805601)

Soil quality, minimising loss of prime quality agricultural land and climatic factors are objectives and/or sub-objectives set out in the SEA framework. The overall Strategy Assessment indicates a range of positive neutral and negative impacts on SEA objectives. **No modification proposed.**

Other issues

A J C Clark (930956)

Disagree with proposed modification. It is too early to predict the impact of BREXIT on the SESplan area. SESplan have a duty to meet statutory timescales and the Proposed Plan has been based on the most recent and up to date information available. The Strategic Development Planning Authority for SESplan has a duty to pass the proposed plan to Scottish Government by end of June 2017 for examination. SESplan are committed to meeting timescales and preventing delay of the Proposed Plan. **No modification proposed.**

Cockburn Association (037249)

The visitor economy is referenced at the beginning of the Proposed Plan in the SESplan Assets pages. Tourism is also specifically referenced elsewhere in the plan in Table 4.1 Significant Business Clusters. **No modification proposed.**

Gladman Scotland (783418)

The representation refers to the Annual Housing Land Update from May 2015 which is a separate document and is not part of the Proposed Plan. **No modification proposed.**

Mr Colin McGrath (790749)

Disagree with proposed modification. The Planning etc. (Scotland) Act 2006 requires the SDP to set out a Vision which represents a broad statement of SESplan's view as to how the SESplan area should develop. Multiple Vision statements would therefore be inappropriate, and would defeat the purpose and aims of strategic level planning. The Scottish Borders LDP will also have its own vision for The Borders. **No modification proposed.**

National Trust for Scotland (040626)

Disagree with proposed modification. The plan makes clear, early reference to cultural and heritage assets (page 4-5 SESplan Assets), including tourism assets.

In relation to tourism, paragraph 4.8 clearly states ‘The rural areas provide significant benefits to the urban population including food production, water supply, renewable energy, timber production and tourism and recreation.’ Paragraph 4.9 of the Proposed Plan goes on to state: ‘These assets support a diverse range of loose business clusters in small and medium scale businesses include tourism, food and drink, textiles manufacturing, farming and forestry, low carbon and creative and niche industries. These businesses make a significant contribution to the city region economy.’ Opportunities for tourism are also highlighted in Table 4.1 Significant Business Clusters. The Strategic Walking and Cycling Routes identified in figure 6.1 and paragraphs 6.5-6.8 also contribute to tourism in the region, in particular the longer distance Recreational Routes. The findings of the environmental report in relation to culture and heritage are reflected in the placemaking principles of the proposed plan. **No modification proposed.**

Ocean Terminal Ltd

Matter is more appropriately set out in City of Edinburgh LDP and accompanying Action Programme. **No modification proposed.**

Shawfair LLP (039940)

It is premature to refer to eventual outcomes of the planning review at this stage, including potential infrastructure funding mechanisms. SESplan appreciates current challenges in delivering infrastructure but this matter is more appropriately set out in action programmes. Delivery of individual sites is a matter for member authorities and their Action Programmes. **No modification proposed.**

Reporter’s conclusions:

[Note: For DPEA use only.]

Reporter’s recommendations:

[Note: For DPEA use only.]