APPENDIX 1:

PROPOSED RESPONSE TO QUESTIONS RAISED IN MAIN ISSUES REPORT

The questions have been grouped together into relevant topics in order to provide a clearer overview of Midlothian Council’s response on the Main Issues Report (MIR).

Vision and Key Aims

Question 1: Do you support the proposed vision for the SESplan area? Do you have any preferred alternatives? What are your reasons for your view?

Question 2: Do you support the proposed key aims for the SESplan area? Do you have any preferred alternatives? What are your reasons for your view?

Midlothian Council response: Yes, Midlothian Council supports the proposed vision for the SESplan area and the proposed key aims.

Sustainable Development and Climate Change

Question 4: Is the preferred approach to sustainable development appropriate? Are there other approaches that the SDP should follow and if so, why?

Midlothian Council response: Midlothian Council considers that the Strategic Development Plan (SDP) should address more specifically how its development strategy will contribute to environmental protection and the objectives of sustainable development, than suggested by paragraph 7.2 of the MIR (to “ensure the surrounding environment is protected” and “consideration of the sustainability of development”).

Question 16: Is the preferred approach to climate change and energy appropriate? If not, what should be changed or are there other approaches which the SDP should follow and why?

Midlothian Council response: The MIR, paragraphs 7.107-7.112, makes no mention of adaptation for a changing climate. The National Planning Framework for Scotland 2 (NPF2) stipulates that climate change impacts should be considered as part of the overall strategic development of both strategic and local development plans. The SDP should raise this issue in the strategic planning context. As signatories to Scotland’s Climate Change Declaration, SESplan partners have committed to ensuring that adaptation measures are clearly incorporated into new plans, in line with sustainable development principles.

Development Strategy

Infrastructure

Question 5: Is the approach to linking future development to the provision of essential infrastructure and seeking contributions towards essential infrastructure appropriate? If not are there alternative mechanisms for contributions which the SDP should explore and why? What are these?

Midlothian Council response: Midlothian Council considers the approach is appropriate. Significant investment is required in infrastructure, including transport
and education, to implement existing development commitments and future development requirements. Delivery of existing committed development is a key requirement and priority over new allocations coming forward through SESplan. However, there are difficulties in delivering existing development commitments in many areas. This is largely due to the current economic conditions and the scale of new infrastructure required in some locations.

Councils are investigating new ways that may be used to help to fund the significant infrastructure costs that exist to facilitate development. This will involve partnership working between local authorities, developers, landowners, Scottish Government and key agencies. Additional development allocations may assist in helping to deliver necessary infrastructure, but they will have an infrastructure requirement themselves. New development should not hinder the delivery of existing committed development.

Location of Development

Question 6: Is the preferred approach to guide development towards accessible locations appropriate? Should the SDP follow another approach and, if so, what and why?

Midlothian Council response: Yes, Midlothian Council supports the preferred approach of the MIR. This Council considers investment in transport infrastructure is critical to increase and maintain accessibility to key destinations across both Midlothian and the SESplan area. See also the response to Question 5.

Midlothian Council strongly supports the early implementation of the Borders rail project. This Council is concerned that the success of future development may be jeopardised by congestion of the major and local road network. For example, Sheriffhall junction on the A720 Edinburgh City Bypass is heavily congested at certain times of the day, and is likely to become more congested through increased levels of traffic growth.

This Council considers the following transport investments are necessary to help successfully deliver the development strategy in the South East Edinburgh and Midlothian Borders Corridor strategic growth areas and must be referred to in the Proposed Plan:

- delivery of the Borders Railway and complementary infrastructure as a key priority, with the potential for a new rail station at Redheugh new community to be investigated;
- grade separation of the Sheriffhall roundabout on the A720 and improvements to other key junctions on the A720 Edinburgh City Bypass;
- support for enlargement of existing park and ride sites, including Sheriffhall, and new ones at Lothianburn and north of the junction of the A68 and A720 Edinburgh City Bypass;
- implementation of a peripheral East/ West Orbital Bus network connecting park and ride sites and key destinations around the A720 Edinburgh City Bypass;
• **continued bus priority measures**;

• **improvements to the A701 and key road junctions on other routes, including the A7**;

• **improvements to the local road network, including local distributor roads where required, to cater for new development**; and

• **safeguarding of a potential tram route to Edinburgh Royal Infirmary, Newcraighall and Dalkeith**.

**Brownfield Land**

Question 10: Is the preferred approach to continue to support the redevelopment of brownfield land appropriate? Should the SDP set a target and if so, why? Are there other alternative approaches that the SDP should follow and if so, why?

Midlothian Council response: Midlothian Council supports the preferred approach to redevelopment of brownfield land as set out in the MIR and does not consider it appropriate for the Proposed Plan to set a target for reuse of brownfield land. However, there may be a case for the Proposed Plan to clarify the expectations for windfall completions from each local authority area, i.e. 4,200 from City of Edinburgh Council, 280 from East Lothian Council, 2,100 from Fife Council, 800 from Midlothian Council, 1,900 from Scottish Borders Council and 1,600 from West Lothian Council in the period to 2019 (information taken from figure 9 of the Housing Technical Note). This is because the success of windfall contributions is critical to the scale of the allocated land requirement, and as a result the delivery of the brownfield/ windfall land will need to be monitored.

It is acknowledged that, as set out in paragraph 7.70, there are differing land use characteristics across the SESplan area, with some areas having less potential for brownfield land coming forward to fulfil development requirements. It is important that the Proposed Plan acknowledges this and recognises that greenfield land releases will be necessary to meet the development requirements of the “market recovery” approach set out in the MIR.

**Agricultural Land**

Question 20: Is the preferred approach to protecting agricultural land and other important soils appropriate? Are there other approaches that the SDP should follow and if so, why?

Midlothian Council response: Midlothian Council supports the strong protection afforded to prime agricultural land, in line with Scottish Government policy, which considers it should only be utilised for development where it is an essential component of the settlement strategy.

**Housing and Economic Development**

Question 3: Is the preferred approach to the scale of future development, on the basis of the ‘market recovery’ scenario related to economic growth areas, appropriate? If not, should the SDP identify land sufficient to meet the ‘high growth’ scenario? Is there another approach that the SDP should follow and if so, why?
Midlothian Council response: Midlothian Council supports the preferred approach. There are already substantial committed housing and economic development proposals in both corridors affecting Midlothian which will have implications for communities and infrastructure, including transport and education. This Council considers the delivery of existing development commitments is a key requirement and a priority of any approach for SESplan.

Midlothian Council supports the “market recovery” approach in the Main Issues Report and its identification of growth requirements to 2032. It considers that this scenario takes realistic account of the substantial impact that the recession has had on the Scottish economy and the development industry, at least in the short to medium term. The scale of additional development arising from this scenario should be able to be accommodated within Midlothian, although this will have an increasing and cumulative impact on communities. It is considered inappropriate to promote the “high growth” scenario in the current economic climate. There will be a generous supply of land to meet requirements, and this position can be reviewed at the next SDP review period, within four years.

See also the response to question 9 with regard to flexibility for bringing forward housing land requirements.

Housing

Question 9: Is providing housing land supply across the SESplan area as set out in Figure 12 appropriate? If not, should the SDP identify land sufficient to meet the high growth scenario? Is there another approach that the SDP should follow and if so, why?

Midlothian Council response: This Council supports the provision of housing land supply as identified in Figure 12, but, where strategic growth areas straddle two administrative boundaries as is the case in South East Edinburgh and the Midlothian Borders Corridor, there needs to be clarity about the subdivision of land requirements by area and plan period in order to provide clarity on the scale of allocations that will require to be made in each local development plan.

Midlothian Council requests that the Proposed Plan provides a measure of flexibility to allow local development plans to adjust the phasing of development, if this would help to overcome constraints on delivery, especially in relation to the funding of essential infrastructure. The discretion to bring forward housing land requirement from future years for delivery in the earlier part of the plan period should lie with individual councils. Any early releases of housing land should still be required to be consistent with the strategy aims of the SDP, and should not exceed the overall SDP total allocations for that council area.

Midlothian Council considers the two growth areas relating to Midlothian can offer opportunities for development up to the scale as set in the MIR. The identification of the most appropriate sites should not be constrained by the Proposed Plan. It will be for the local development plans to determine which communities will accommodate the strategic development requirements, within the context of the SDP development strategy.
Affordable Housing

Question 11: Should the SDP set a benchmark of 25% affordable housing contribution on all sites? If not, should the SDP set a target for each partner authority based on local needs or should the SDP support the provision of affordable housing with each LDP setting their own targets? Are there alternative approaches to the provision of affordable housing and if so, why?

Midlothian Council response: It should be for individual local authorities to set the affordable housing requirement that they consider appropriate for that council area. Scottish Planning Policy supports this approach where it is justified by a housing need and demand assessment and is included in the local housing strategy and development plan. Midlothian Council supports the 25% benchmark requirement set by Scottish Government.

Economic

Question 7: Is the preferred approach to promote strategic economic growth areas appropriate? Is the alternative approach appropriate or should the SDP follow other approaches and if so, why?

Midlothian Council response: Midlothian Council supports the strategic economic growth areas identified in the Main Issues Report and the preferred approach set out in the MIR. However, this Council requests that the Proposed Plan makes specific provision for additional economic land allocations within the Midlothian parts of the two relevant strategic growth areas amounting to 30-40 ha. This will build upon successful business locations and help in the provision of local jobs and sustainable communities.

Midlothian Council further requests that the Proposed Plan should refer to the Edinburgh Science Triangle, rather than the Edinburgh Bio Quarter to reflect that the life science/animal sciences industries have a geographic spread across the SESplan area, rather than the more restricted references made in the MIR at paragraph 7.45.

Midlothian Council’s responses to Questions 26 and 29 provide more detail in relation to its views on economic development in the two corridors within which the Midlothian Council area is located, and should be read in the context of this consultation question.

Retail Development

Question 8: Is the preferred approach to identify a strategic retail hierarchy based around Edinburgh City Centre appropriate? Is the alternative approach appropriate or should the SDP follow other approaches and if so, why?

Midlothian Council response: Midlothian Council supports retail and commercial development in town centres. It also considers that the Proposed Plan should make provision for support of Straiton Retail Park as a commercial centre, in line with Scottish Planning Policy i.e. with development plan status.

Midlothian’s communities will experience significant expansion through committed and proposed growth in this SDP. Much of this will be within reasonable access from
the A701. Straiton will be able to fulfil a broad range of retail and commercial leisure needs to complement the retail offer in Midlothian’s town centres. Accordingly, Midlothian Council considers that there is potential for further retail and commercial/leisure development in the Straiton area, with related improvements to the transport infrastructure which would be greatly beneficial to realising the SDP development strategy as it relates to the Midlothian Borders Corridor.

Environment

Natural Heritage and Landscape

Question 12: Is the preferred approach to protecting and enhancing South East Scotland’s natural heritage and landscapes appropriate? Is there another approach that the SDP should follow and if so, why?

Midlothian Council response: Midlothian Council supports the preferred approach to protecting and enhancing South East Scotland’s natural heritage and landscape. This Council considers that the SDP needs to include protection for RIGS (Regionally Important Geological Sites) and Local Geodiversity Sites to acknowledge the importance of geodiversity alongside other designated sites. The Proposed Plan should make reference to habitat as well as species, where biodiversity is raised in the document.

This Council considers that the SDP should ensure the protection of designated sites through local development plans and require mitigation measures where it is considered necessary to help protect these features.

Green Network

Question 13: Is the preferred approach to designating the green network appropriate? Are the opportunities for the development of the green network appropriate? Are there other strategic opportunities which should be identified? Are there other approaches that the SDP should follow and if so, why?

Midlothian Council response: Midlothian Council considers the preferred approach to designating the Green Network is appropriate. The opportunities for the development of the Green Network should link to the development and delivery of NPF2’s National Development 12 ‘Central Scotland Green Network’ through the delivery of allocations made in local development plans. The importance of the role of developer contributions and the Scotland Rural Development Programme (SRDP) for the delivery of the Green Network should be made in the Proposed Plan. There will also be an important link between Green Belt land and the Green Network, as well as with land not designated as Green Belt.

With regard to paragraph 7.88, the Proposed Plan should recognise that the Edinburgh and Lothians Forest Habitat Network Partnership has now evolved into the Lothians and Fife Green Network Partnership.

Green Belt

Question 14: Is the preferred approach to broadly maintaining the Green Belt appropriate? Are there other alternative approaches that the SDP should follow and if so, why?
Midlothian Council response: Midlothian Council supports the preferred approach to Green Belt strategy as set out in the MIR. The conclusions of the 2008 Edinburgh Green Belt Study will help inform decision making on releasing land from the Green Belt, through local development plans, in order to meet strategic development requirements. The results of the study will feed into any supplementary guidance produced by SESplan.

The conclusions of the Edinburgh Green Belt Study will require to be considered against other matters when identifying land for development. These will include loss of community identity and settlement coalescence which are significant concerns for many residents in Midlothian.

Countryside Development

Question 15: Is the preferred approach to controlling development in the countryside appropriate? If not, what approach should the SDP follow and why?

Midlothian Council response: This Council supports the preferred approach. The Proposed Plan should enable local development plans to identify the type of small-scale development appropriate to their area, given the diversity of the SESplan area and the different transportation and environmental issues.

See the response to Question 20 on protection of agricultural land.

Renewable Energy

Question 17: Is the preferred approach to renewables appropriate? Are there other approaches that the SDP should follow and if so, why?

Midlothian Council response: This Council supports the preferred approach to renewable energy as set out in the MIR and considers cross-boundary working between individual councils to be very important for the development of the locational criteria referred to in paragraph 7.116. The SDP, and in turn local development plans, will need to set out the criteria that need to be considered in determining the capacity for renewable energy and for assessing proposals, which should include impacts on natural and cultural heritage and biodiversity.

Forestry

Question 18: Is the preferred approach to forestry appropriate? Are there other approaches that the SDP should follow and if so, why?

Midlothian Council response: Midlothian Council considers the preferred approach to forestry is appropriate. The Proposed Plan should give consideration to adding reference to the emerging Forestry Framework for Edinburgh and the Lothians, in addition to the existing Scottish Borders Woodland Strategy.

Minerals

Question 19: Is the preferred approach to minerals appropriate? Are there other approaches and if so, why?

Midlothian Council response: The Proposed Plan should set out a clear direction for local development plans to make provision for mineral working and ensure a
consistent approach across the SESplan area, which can be informed by supplementary guidance.

Flooding

Question 21: Is the preferred approach to maintaining water and controlling flooding appropriate? Are there other approaches that the SDP should follow and if so, why?

**Midlothian Council response:** Midlothian Council supports the preferred approach set out in the MIR, as this is in accord with the principles of the Water Framework Directive.

Waste

Question 22: Is the preferred approach to waste appropriate? Are there other approaches that the SDP should follow and if so, why?

**Midlothian Council response:** Midlothian Council considers that the Proposed Plan should reflect the provisions of Scotland’s Zero Waste Plan 2010 which was published in June 2010. Consideration should also be given to including reference to Annex B of this document in the Proposed Plan and updating other references in line with the Zero Waste Plan 2010 (e.g. previous area waste plans may now not be relevant).

Midlothian Council is supportive of a Zero Waste project at Millerhill and requests that reference be made in the Proposed Plan to this initiative and the potential that it creates for complementary businesses in the local area.

**SESplan Strategic Growth Areas**

**Edinburgh City Centre**

Question 23: Is the preferred approach of continuing to support the continued development of the City Centre appropriate? If not, what alternative approach should the SDP follow and if so, why?

**Midlothian Council response:** No comment

**Edinburgh Waterfront**

Question 24: Is the preferred approach to continuing to support the redevelopment and regeneration of Edinburgh Waterfront appropriate? If not, what approach should the SDP follow and why?

**Midlothian Council response:** No comment

**West Edinburgh**

Question 25: Is the preferred approach which promotes housing alongside the nationally important business proposals in West Edinburgh appropriate? Should the SDP follow another approach and if so, why?

**Midlothian Council response:** Midlothian Council considers it is important to the successful delivery of economic development in West Edinburgh that the Orbital Bus project is implemented and this should be a key transport infrastructure requirement.
in support of the West Edinburgh strategic growth area. This Council considers that faster radial and orbital public transport connections are required, and that this project could greatly improve public transport accessibility to West Edinburgh from areas to the east and south of the city.

South East Edinburgh

Question 26: Is the preferred approach to further expand South East Edinburgh appropriate? If not, what alternative approach should the SDP follow and why?

Midlothian Council response: Midlothian Council supports the preferred approach for the South East Edinburgh strategic growth area. Development of the Shawfair new community should be a key priority.

Midlothian Council considers the specific locations for development within the area will be the subject of the Midlothian Local Development Plan, in consultation with local communities.

The Council supports the promotion of the South East Edinburgh economic development hub comprising Little France, Shawfair and Millerhill in the South East Edinburgh strategic growth area, Salter’s Road and Sheriffhall South in the Midlothian Borders Corridor and Queen Margaret University/Craighall in the East Coast Corridor.

This Council considers that the Shawfair Business Park has significant potential for attracting investment and jobs, particularly given its communication links through excellent access to the strategic road network, Sheriffhall park and ride with bus-based public transport linkages and the Orbital Bus Route, and its proximity to the Borders Rail.

South East Edinburgh provides the opportunity for creating a significant variety of economic and employment prospects. This diversity can arise from opportunities associated with the Edinburgh Royal Infirmary, Edinburgh Bio Quarter, Shawfair Business Park including the Scottish Qualifications Authority, the Millerhill Zero Waste Project and its opportunity for complementary businesses associated with this use and from possible commercial and leisure opportunities north of the junction of the A68 and A720 roads.

See also responses to Questions 3, 4, 5, 6, 7, 9, 11, 14, 25 and 29.

East Coast Corridor

Question 27: Is the preferred approach appropriate? Is the alternative approach appropriate or should the SDP follow other approaches and if so, why?

Midlothian Council response: No comment

Fife Forth Corridor

Question 28: Is the preferred approach appropriate? Is the alternative approach appropriate or should the SDP follow other approaches and if so, why?

Midlothian Council response: No comment
Midlothian Borders Corridor

Question 29: Is the preferred approach to development appropriate and if so, why? Is the alternative appropriate? If not, what approach should be adopted and why?

Midlothian Council response: Midlothian Council supports the preferred approach as set out in the MIR. In this respect the Council supports appropriate residential and employment growth in Midlothian’s communities. It considers that this can assist with delivering the aims of the Midlothian Economic Development Framework.

There is strong demand for economic land in Midlothian due to its proximity to Edinburgh and strategic transport routes. The Council considers existing economic land supply, particularly in the north Midlothian towns, has potential for attracting further investment and growth and that this should be supported.

The life sciences/animal sciences in the Midlothian Campuses of the Edinburgh Science Triangle have considerable potential for further growth. This business sector is positively supported by Midlothian Council and the Scottish Government and is referred to in NPF2. Midlothian Council welcomes the support in the MIR and urges that it remains in the Proposed Plan.

Midlothian Council supports the reference in the MIR to the scope for further development of the new community (at Redheugh) beyond the existing commitments, which concurs with the aspirations set out in the Edinburgh and the Lothians Structure Plan 2015 and the adopted Midlothian Local Plan for further development at the new community. Any further development would need to be within a suitable landscape framework and should assist with achieving a critical mass to help fund new infrastructure, including support towards the Borders Railway. A feasibility study has been undertaken into providing an additional rail station on the Borders Rail line at Redheugh. A rail station at this location would further improve accessibility and serve the community.

See also responses to Questions 3, 4, 5, 6, 7, 8, 9, 11, 14, 25 and 26.

West Lothian Corridor

Question 30: Is the preferred approach appropriate? Is the alternative approach appropriate or should the SDP follow other approaches and if so, why?

Midlothian Council response: No comment