

# Planning Committee

10am, Thursday, 15 May 2014

## Strategic Development Plan Supplementary Guidance on Housing Land

Item number	6.1
Report number	
Executive/routine	Executive
Wards	All

### Executive summary

---

When Scottish Ministers approved the Strategic Development Plan on 27 June 2013, they included a requirement that within 12 months SESplan prepare supplementary guidance on housing land. This was to provide further detailed information for Local Development Plans on how much of the overall housing land requirement should be met in each of the six member authority areas in the period to 2024. On 10 March, the SESplan Joint Committee approved the Supplementary Guidance. The purpose of this report is to invite the Committee to ratify the decision by the SESplan Joint Committee to approve the Supplementary Guidance for submission to Scottish Ministers and to adopt the Guidance following expiration of the 28 day Ministerial consideration period.

### Links

---

Coalition pledges	<a href="#">P8</a> , <a href="#">P15</a> , <a href="#">P17</a> , <a href="#">P18</a>
Council outcomes	<a href="#">CO7</a> , <a href="#">CO8</a> , <a href="#">CO16</a> , <a href="#">CO18</a> , <a href="#">CO19</a> , <a href="#">CO22</a> , <a href="#">CO23</a>
Single Outcome Agreement	<a href="#">SO1</a> , <a href="#">SO4</a>

## Strategic Development Plan Supplementary Guidance on Housing Land

### Recommendations

---

- 1.1 It is recommended that the Committee:
- 1 ratifies the decision of the SESplan Joint Committee to approve editorial changes of a non-policy nature to the Supplementary Guidance on Housing Land and its accompanying documents as set out in the Appendix to this report;
  - 2 ratifies the decision of the SESplan Joint Committee to approve the Supplementary Guidance subject to the minor editorial changes and to submit the Guidance to Scottish Ministers; and
  - 3 agrees to adopt the Supplementary Guidance following the expiration of the 28 day Ministerial period for consideration, unless Scottish Ministers direct otherwise.

### Background

---

- 2.1 SESplan is the Strategic Development Planning Authority for Edinburgh and south east Scotland. It covers the council areas of the City of Edinburgh, East Lothian, Fife (part), Midlothian, Scottish Borders and West Lothian. The Planning etc (Scotland) Act 2006 requires these councils to work together to prepare and keep under review a Strategic Development Plan (SDP) for the Edinburgh city region.
- 2.2 The first Strategic Development Plan was approved by Scottish Ministers on 27 June 2013. In approving the plan, they modified Policy 5 to require SESplan to prepare supplementary guidance (SG) on housing land, to provide further detailed information for Local Development Plans (LDPs) on how much of the overall housing land requirement should be met in each of the six member authority areas in the period to 2024.
- 2.3 The draft SG was considered and approved by the SESplan Joint Committee on 30 September 2013 and the decision was subsequently ratified by the Planning Committee on 23 October. The draft SG was subject to a six week consultation period that ended on 20 December. The outcome of the consultation was considered by the SESplan Joint Committee on 10 March 2014. The Joint Committee agreed to the recommendation by the SESplan manager to:

1. Approve editorial changes of a non policy nature to the draft SG on Housing Land;
2. Approve the draft SG on Housing Land subject to the minor editorial changes for submission to the Scottish Ministers; and
3. Request that the Member Authorities ratify the editorial changes and the decision to submit to Scottish Ministers and adopt the Supplementary Guidance on Housing Land at the expiration of the 28 day Ministerial consideration period unless the Scottish Ministers direct otherwise.

The SESplan Manager's report is attached as Appendix 1.

- 2.4 This report sets out the results of the consultation and invites the Committee to ratify SESplan's approval of minor editorial changes to the SG and its supporting documents following the consultation. It also invites the Committee to ratify the decision to submit the SG to Scottish Ministers and to adopt the guidance, at the expiration of the 28 day Ministerial consideration period unless Scottish Ministers direct otherwise.

## Main report

---

- 3.1 The consultation exercise on the draft SG set a series of consultation questions. A full analysis of the responses can be found in Appendix B of the SESplan report. A total of 167 consultees responded raising 583 responses. There was a wide range of consultees who responded including key agencies, individuals, community councils, developers, planning agents and landowners. There was a broad spread of opinions given presenting a range of opposing views. For example, in general the building industry considered the housing requirements were too low and did not meet the requirements of the Scottish Planning Guidance, whereas individuals and community groups considered they were too high and would result in detrimental impacts.
- 3.2 The largest proportion of comments received related to the Edinburgh area. Although the responses received raised numerous issues, a significant proportion of the responses could be grouped into four key issues: delivery (14%), green belt (13%), policy (13%) and strategy (12%).
  - **Delivery:** the majority of responses raised the issue of lack of finance and the current economic downturn as key factors in preventing delivery of development.
  - **Green Belt:** the majority of responses suggested that the green belt should be protected.
  - **Policy:** related to the responses on the Green Belt, respondents suggested that the delivery of the housing land requirement on greenfield land will lead

to outcomes contrary to the Government's and SESplan's overall Vision and Aims.

- **Strategy:** a number of respondents suggested there was no justification to explain the distribution of the housing land requirement set out in Table 3.1 of the SG.

3.3 Having weighed up the various, often conflicting, issues raised in the consultation, SESplan considers that the existing content of the SG provides a reasonably balanced position. Many of the suggested changes, for example, would not have been in line with the strategy of the approved SDP, and would have undermined the delivery of existing committed development. As a result, SESplan are proposing some minor editorial changes to the SG and its accompanying technical note. These changes aim to:

- provide a better description of how the shortfall in housing need that arises in Edinburgh will be met;
- clarify the role and justification behind identifying land outwith Strategic Development Areas;
- make editorial changes to Sections 5 and 6 of the Technical Note clarifying the methodology undertaken and that the SG must accord with the approved SDP spatial strategy; and
- make corrections to the technical note.

3.4 A copy of the SG and its associated technical note incorporating these changes can be found in Appendix 2. In addition, the full suite of documents associated with the SG can be found at [www.sesplan.gov.uk](http://www.sesplan.gov.uk)

3.5 It should be stressed that these changes do not affect the housing numbers. The SG continues to apportion a SESplan-wide total housing target of 107,560 homes by the six council areas and by two plan phases: 2009 to 2019 and 2019 to 2024. The target is derived from the Housing Needs and Demand Assessment that was prepared by SESplan in accordance with a methodology prescribed by the Scottish Government.

3.6 The housing requirement figures set out in the SG for Edinburgh are also unchanged from the draft. In the period 2009-2019, Edinburgh's apportionment is 22,300 homes from a total for that phase of 74,840 (30%); the figure for the 2019-24 period is 7,210 from 32,720 (22%).

3.7 If the Committee agrees to ratify the SESplan decision and it has also been ratified by the other five councils, the SG will be submitted to Scottish Ministers on 16 May 2014. After 28 days have elapsed (13 June 2014), assuming Scottish Ministers do not direct otherwise, the SG will be adopted.

3.8 The process of preparing and adopting the SG has to be completed within the timescale set out in the SDP approval letter, where Scottish Ministers stated that they expected the SG to be adopted within 12 months of the date of the approval of the SDP, that is by no later than 27 June 2014.

## Measures of success

---

- 4.1 The proposed actions will be measured as follows:
- The SG proceeds to SESplan's published timetable and meets Scottish Ministers' expectations.
  - When approved, the SG guides the content of emerging Local Development Plan.

## Financial impact

---

- 5.1 There are no financial impacts arising from this report.

## Risk, policy, compliance and governance impact

---

- 6.1 Failure to agree the recommendations of this report, will result in the SG not being ratified, and introduces the risk of the guidance not being adopted before 27 June. This is the deadline the Scottish Minister set when they approved the SDP.
- 6.2 The approval and adoption of the guidance will require the review of the Council's Proposed Local Development Plan as it has to be consistent with the SDP and the SG. A review of the Proposed Local Development Plan has been carried out in parallel and a separate report to the Planning Committee has been prepared.
- 6.3 The report does not raise any health and safety, governance, compliance or regulatory issues other than those set out above.

## Equalities impact

---

- 7.1 An Equalities Impact Assessment was prepared and subsequently updated by SESplan as part of the process of preparing the SDP. It reported that there were mostly neutral impacts. Details are available at <http://sesplan-consult.objective.co.uk/portal/sg/hsgland?tab=files>
- 7.2 The SG is required to provide further information in support of approved SDP Policy 5 (Housing Land). As such there are no changes to the underlying Vision and Aims of the approved SDP which have already been subject to an assessment.

## Sustainability impact

---

- 8.1 The SG was subject to Strategic Environmental Assessment. The Environmental Report (placed in Group Rooms and available at [www.sesplan.gov.uk](http://www.sesplan.gov.uk)) identifies, describes and evaluates the likely significant effects of the Supplementary Guidance. The SDP itself was also supported by an environmental report.
- 8.2 The impacts of this report in relation to the three elements of the Climate Change (Scotland) Act 2009 Public Bodies Duties have been considered, and the outcomes are summarised below. Relevant Council sustainable development policies have been taken into account.
- The proposals in this report will increase carbon emissions and this impact will be addressed by measures such as locating development in locations accessible to sustainable transport, and including measures to encourage high public transport mode share in LDPs.
  - The proposals in this report will increase the city's resilience to climate change impacts because the SG seeks to focus development in the first instance in Strategic Development Areas which are more accessible locations, which in turn reduce the need to travel.
  - The proposals in this report will help achieve a sustainable Edinburgh because they seek to provide additional housing to meet Edinburgh's growing housing requirement in sustainable locations with good access to sustainable transport options.

## Consultation and engagement

---

- 9.1 SESplan published the draft supplementary guidance for a six-week consultation period from 11 November to 20 December 2013. A summary of the comments received and SESplan's response can be found in the SESplan report attached at Appendix 1.

## Background reading / external references

---

[www.sesplan.gov.uk](http://www.sesplan.gov.uk)

Report to Planning Committee – 23 October 2013 – Strategic Development  
Plan Supplementary Guidance on Housing Land

### Mark Turley

Director of Services for Communities

Contact: Keith Miller, Senior Planning Officer

E-mail: [keith.miller@edinburgh.gov.uk](mailto:keith.miller@edinburgh.gov.uk) | Tel: 0131 469 3665

---

## Links

---

<b>Coalition pledges</b>	<p>P8 Make sure the city's people are well-housed, including encouraging developers to built residential communities, starting with brownfield sites</p> <p>P15 Work with public organisations, the private sector and social enterprise to promote Edinburgh to investors</p> <p>P17 Continue efforts to develop the city's gap sites and encourage regeneration</p> <p>P18 Complete the tram project in accordance with current plans</p>
<b>Council outcomes</b>	<p>CO7 Edinburgh draws in new investment in development and regeneration</p> <p>CO8 Edinburgh's economy creates and sustains job opportunities</p> <p>CO16 Well-housed – People live in a good quality home that is affordable and meets their needs in a well-managed neighbourhood</p> <p>CO18 Green – We reduce the local environmental impact of our consumption and production</p> <p>CO19 Attractive Places and Well Maintained – Edinburgh remains an attractive city through the development of high quality buildings and places and the delivery of high standards and maintenance of infrastructure and public realm</p> <p>CO22 Moving efficiently – Edinburgh has transport system that improves connectivity and is green, healthy and accessible</p> <p>CO23 Well engaged and well informed – Communities and individuals are empowered and supported to improve local outcomes and foster a sense of community</p>
<b>Single Outcome Agreement</b>	<p>SO1 Edinburgh's economy delivers increased investment, jobs and opportunities for all</p> <p>SO4 Edinburgh's communities are safer and have improved physical and social fabric</p>
<b>Appendices</b>	<p>Appendix 1: SDP Manager's report to 10 March 2013</p> <p>SESplan Joint Committee</p> <p>Appendix 2: Supplementary Guidance and Technical Note (Incorporating minor editorial changes)</p>

Appendix 1

SDP Manager's Report to SESplan Joint Committee of 10 March 2014



For Decision	✓
For Information	

## ITEM 6 – SUPPLEMENTARY GUIDANCE

Report by: Ian Angus, SDP Manager

---

### PURPOSE

---

This Report has been prepared to:

- Inform the SESplan Joint Committee of the consultation responses received, the main issues raised and the SESplan responses to the responses received on the draft Supplementary Guidance on Housing Land;
- Seek SESplan Joint Committee approval of minor editorial changes of a non policy nature to the draft Supplementary Guidance and accompanying documents;
- Seek SESplan Joint Committee approval to submit the Supplementary Guidance to Scottish Ministers for consideration;
- Inform the SESplan Joint Committee that member authorities will be required to ratify the minor editorial changes and the decision to submit the Supplementary Guidance to Scottish Ministers and adopt the Guidance following the expiration of the 28 day Ministerial consideration period; and
- Inform the SESplan Joint Committee of the findings of the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) of the Supplementary Guidance.

### RECOMMENDATIONS

---

It is recommended that the SESplan Joint Committee:

1. Notes the summaries of the consultation responses received on the Draft Supplementary Guidance on Housing Land attached as Appendix A to this Report;

2. Notes the summaries of the main issues raised by the consultation responses and the SESplan responses attached as Appendix B to this Report;
3. Approves the editorial changes of a non policy nature to the draft Supplementary Guidance on Housing Land, attached as Appendix C to this Report;
4. Approves the draft Supplementary Guidance on Housing Land subject to the minor editorial changes outlined in Recommendation 3 for submission to Scottish Ministers;
5. Requests that the Member Authorities ratify the editorial changes at Recommendation 3 and the decision to submit to Scottish Ministers at Recommendation 4 and adopt the Supplementary Guidance on Housing Land at the expiration of the 28 day Ministerial consideration period unless Scottish Ministers direct otherwise;
6. Notes the updated Strategic Environmental Assessment (SEA) Environmental Report attached as Appendix D to this Report; and
7. Notes the Habitats Regulations Assessment (HRA) of the potential impacts on European Sites from the Supplementary Guidance attached as Appendix E to this Report.

## **RESOURCE IMPLICATIONS**

---

As set out below.

## **LEGAL AND RISK IMPLICATIONS**

---

All risks are detailed in the SESplan Risk Register and reported to Joint Committee on an annual basis.

## **POLICY AND IMPACT ASSESSMENT**

---

No separate impact assessment is required.

### **1. BACKGROUND**

---

- 1.1 In approving the Strategic Development Plan (SDP) on the 27 June 2013, Scottish Ministers made modifications to Policy 5 (Housing Land).

- 1.2 The modifications require Supplementary Guidance to be prepared to provide further detailed information for Local Development Plans (LDPs) as to how much of the overall housing land requirement should be met in each of the six member authority areas (City of Edinburgh, East Lothian, Fife (southern part of Fife only), Midlothian, Scottish Borders and West Lothian) in the periods 2009 - 2019 and 2019 - 2024.
- 1.3 As set out in the SDP approval letter (available for download from the Directorate for Planning and Environmental Appeals website (<http://www.dpea.scotland.gov.uk/CaseDetails.aspx?id=qA313854>), Scottish Ministers expect the Supplementary Guidance to be adopted within 12 months from the date of approval of the SDP. The Guidance must therefore be adopted by no later than the 27 June 2014.

## 2. THE CONSULTATION

- 2.1 At its meeting on the 30 September 2013, the SESplan Joint Committee approved the draft Supplementary Guidance for ratification and thereafter publication. The document was formally published on the SESplan Consultation Portal (<http://sesplan-consult.objective.co.uk/portal>) for a six week period on the 12 November 2013.

### The Questions / Number of Respondents

- 2.2 The Consultation on the draft Supplementary Guidance posed seven questions and a total of 167 Consultees responded, raising 583 responses. Responses were received as follows.

Question	No of Responses Received
1 Do you agree that the Supplementary Guidance complies with Scottish Planning Policy? If not, why not? In what way does the Guidance need to change in order to comply with Scottish Planning Policy?	80

Question	No of Responses Received
2 Do you agree that the distribution of the housing land requirement across each of the six Member Authority areas set out in Table 3.1 is justified? Do you have any further comments on the distribution of the housing land requirement set out in Table 3.1 of the Supplementary Guidance?	87
3 Do you agree with the breakdown by Strategic Development Area as shown in Table 3.2 of the Supplementary Guidance? Do you have any further comments on the additional allowances by Strategic Development Area set out in Table 3.2 of the Supplementary Guidance?	81
4 Do you agree with the additional allowances outwith Strategic Development Areas as shown in Table 3.2 of the Supplementary Guidance? Do you have any further comments on the additional allowances outwith Strategic Development Areas set out in Table 3.2 of the Supplementary Guidance?	70
5 Is the distribution of the housing land requirement including additional allowances, over the period to 2024, shown in Tables 3.1 and 3.2 of the Supplementary Guidance, deliverable? Please set out any comments.	72
6 What can SESplan, the key agencies, developers and Scottish Government do to facilitate delivery of the strategic housing land requirement?	73
7 Are there any further comments on the draft Supplementary Guidance you would like us to consider?	120
<b>Total Responses</b>	<b>583</b>

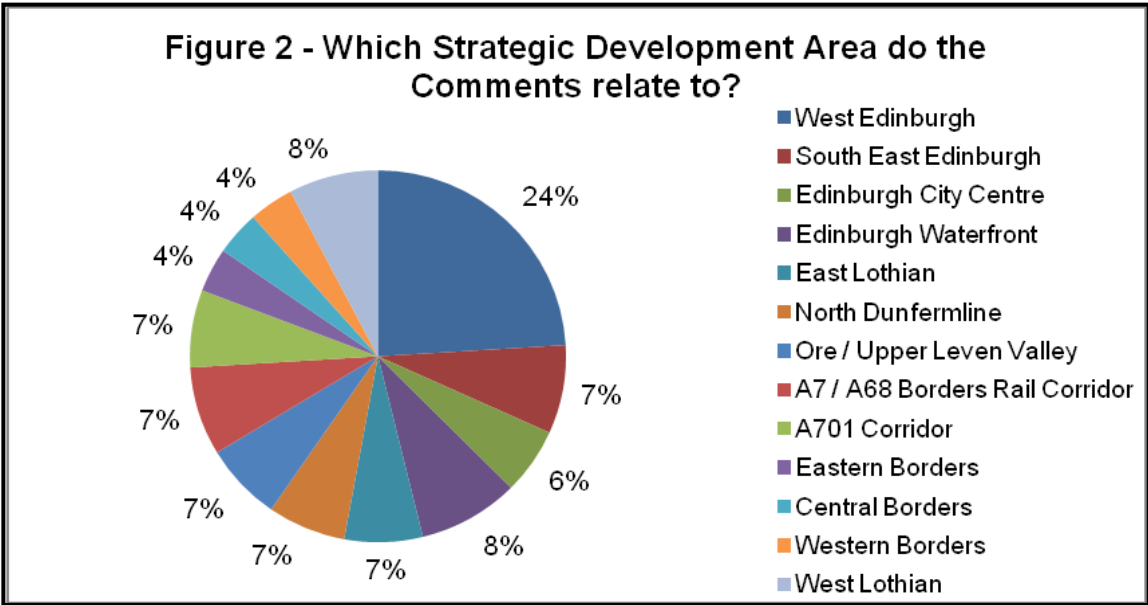
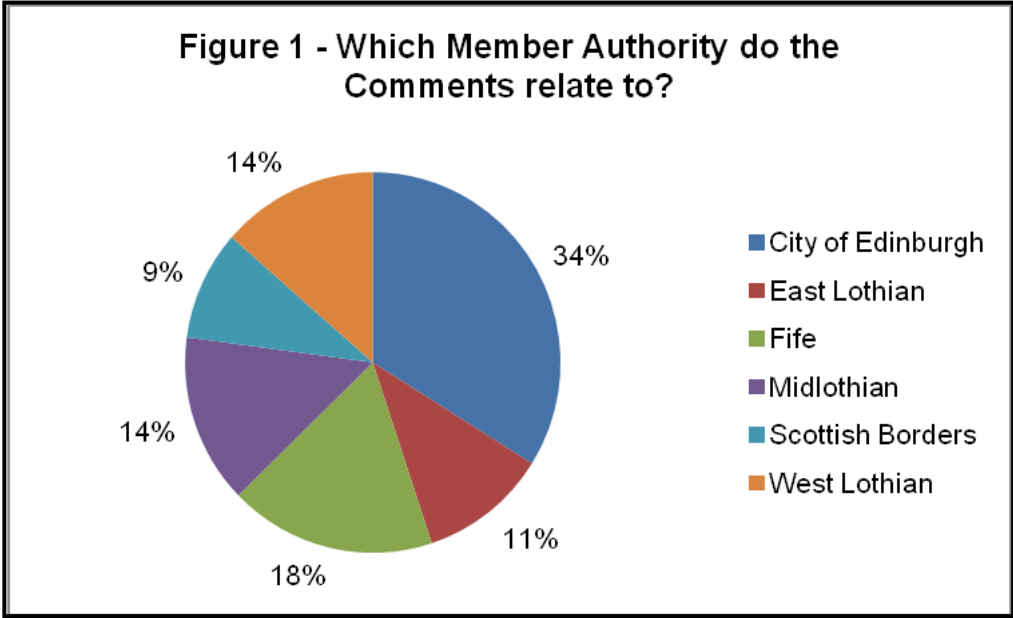
2.3 A summary of all responses received is attached as Appendix A to this Report. The full responses are available to view and download on the SESplan Consultation Portal (<http://sesplan-consult.objective.co.uk/portal/sq/hsgland?tab=list>).

### The Responses in Summary

2.4 There was a wide range of Consultees who responded including key agencies, individuals, community councils, developers, planning agents and landowners.

- 2.5 All respondents to Questions 1, 2 and 3 were asked to initially vote yes / no as to whether the Supplementary Guidance complies with Scottish Planning Policy (SPP) (Question 1) and whether they agreed with Tables 3.1 (Question 2) and 3.2 (Question 3) before being asked to provide comments to explain their answers.
- 2.6 An initial analysis of the yes / no responses shows that the majority of respondees to these questions do not think that the Supplementary Guidance complies with SPP. Nor do they agree with the contents of Tables 3.1 and 3.2. However, a fuller analysis of the comments received (and the summaries set out within Appendix A) shows that there are many opposing views which result in a 'no' response. This could be representative of opposing positions reflecting public / community and development industry views on housing development.
- 2.7 For Question 1, many individual and community groups feel that the Guidance does not comply with SPP because pursuing the delivery of the housing requirement on greenfield and green belt land and at locations which they consider unsustainable will be to the detriment the Government's and SESplan's sustainable goals and aims. It is felt that the delivery of brownfield sites should be prioritised and incentivised. This is the opposite of what many developers and landowners responses state in that more greenfield and green belt sites in or near Edinburgh are required to meet need and demand where it arises.
- 2.8 The divergence of qualifying comments to Questions 2 and 3 were similar. Some community groups and individuals state that the requirements and allowances were too high, undeliverable and would result in detrimental environmental impacts and overstretched infrastructure. Whereas many developers and landowners felt that the requirements and allowances were too low with some submitting further information on particular site interests. Furthermore these groups considered that existing strategic sites should not be relied upon since they will not deliver. Many felt that Edinburgh could accommodate more development than required by Table 3.1.

2.9 Respondents on Questions 2 and 3 were also asked which Member Authority area and which Strategic Development Area (SDA) the comments relate to. The majority of respondents as detailed in Figures 1 and 2 below indicated that their comments related to Edinburgh (34%) and to the West Edinburgh SDA (24%).

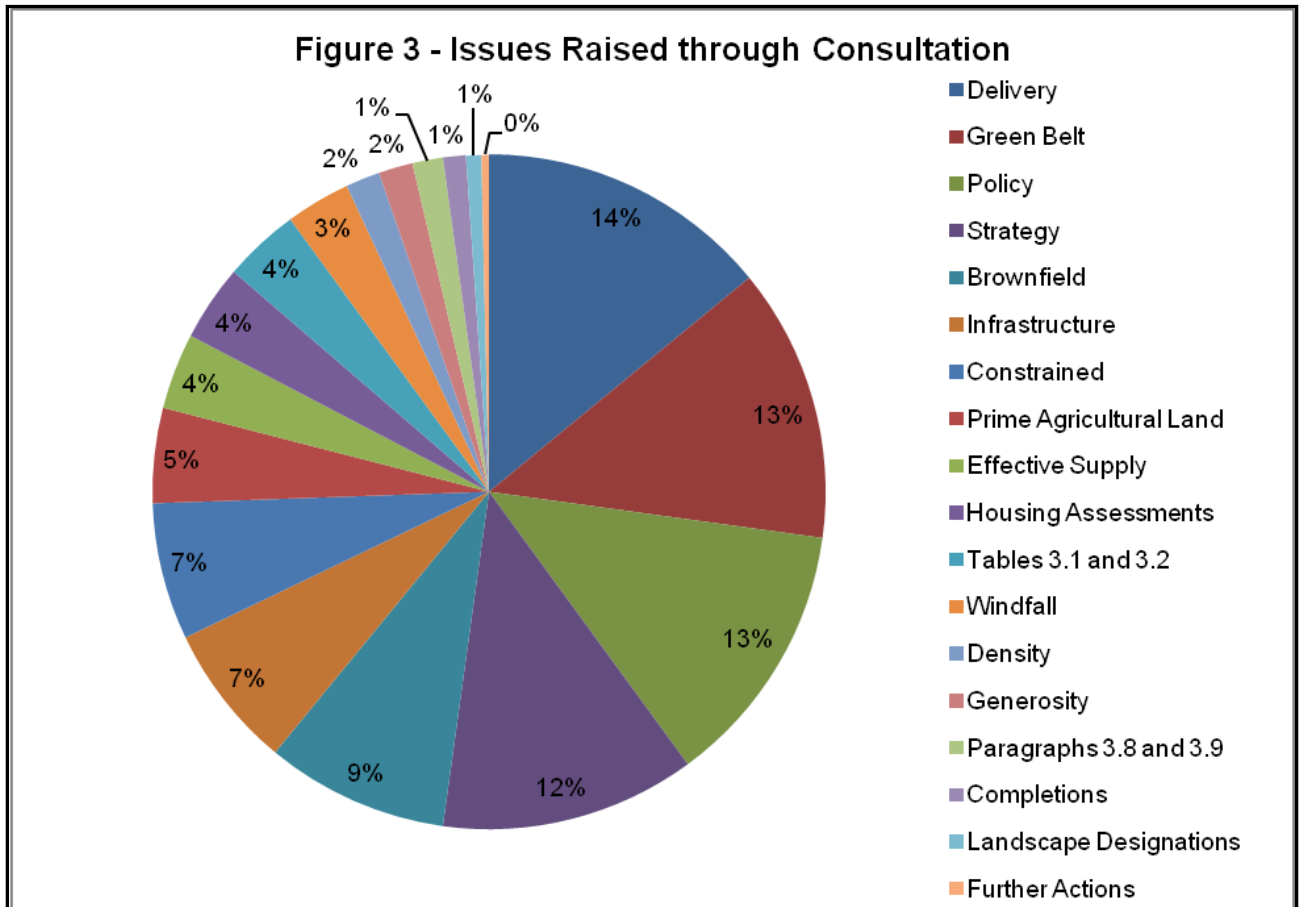


2.10 Whilst Questions 2 and 3 focussed on Tables 3.1 and 3.2 and agreement with the housing land requirement figures, Questions 5 and 6 sought responses on wider planning issues related primarily to infrastructure and delivery. These responses will inform future iterations of the SDP, other ongoing related work on infrastructure funding and delivery and the preparation of LDPs.

2.11 Question 7 sought any further comments. For those making one single comment, often individual members of the public, this is where they made their comments. Others used their responses to this question to summarise the points they had made in the previous questions.

**The Issues Raised**

2.12 As detailed within Appendix B the responses received have raised several issues. The majority of the responses as shown in Figure 3 below focus on four issues – delivery (14%), the Green Belt (13%), policy (13%) and strategy (12%).



- 2.13 **Delivery** - The majority of responses (Appendix B Issue D3) raised the issue of lack of finance and that it is the current economic downturn which is preventing delivery. Both the SDP and LDP will promote sustainable economic growth and housing completions will be required to be increased from recent levels. This is challenging and ambitious and SESplan together with the Member Authorities will continue to work with the development industry, key agencies and the Scottish Government to increase housing delivery rates.
- 2.14 **Green Belt** – The clear majority of responses (Appendix B Issue J1) advised that the Green Belt should be protected for the benefits it provides. In terms of the Supplementary Guidance the Green Belt was a criteria examined through the Spatial Strategy Assessment. The purpose and importance of the Green Belt are acknowledged in SDP Policy 12 (Green Belts). A key criteria of SDP Policy 7 (Maintaining a Five Year Housing Land Supply) is that development on greenfield sites either within or outwith the identified SDAs will not undermine Green Belt objectives.
- 2.15 **Policy** – Related to the responses on the Green Belt, a number of respondents considered that delivery of the housing land requirement on greenfield land will lead to outcomes contrary to the Government’s and SESplan’s overall Vision and Aims (Appendix B Issue Q1). In preparing the Supplementary Guidance, SESplan has taken a balanced and considered approach. The housing land requirement across the SESplan area has to be met and the Supplementary Guidance seeks to do this by balancing the requirement to meet sustainable economic growth objectives with other goals whilst taking into account infrastructure and environmental constraints.
- 2.16 **Strategy** – A number of respondents considered that there is no justification to explain the distribution of the housing land requirement set out in Table 3.1 (Appendix B Issue S1). As detailed in the Technical Note, the distribution of the requirement is based upon a full consideration of the infrastructure and environmental constraints across the SESplan area. To assist clarity, it is proposed to replace Paragraph 3.5 of the Guidance. The replacement wording will provide further transparency as to the assessments undertaken to inform the Supplementary Guidance.



## **The Key Agencies and Scottish Government**

- 2.17 Responses were received from four key agencies (Scottish Natural Heritage (SNH), SEPA, Scottish Water and Historic Scotland) and Scottish Government which included comments from Transport Scotland.
- 2.18 SNH, in answering Question 2, advised they cannot comment on housing need and demand. However, SNH did advise that meeting the housing land requirement is likely to impact on a number of natural heritage interests, including soils, habitats, species and landscape and that opportunities for enhancement should be identified within LDPs. There was agreement on Question 3 with further advice that the distribution of housing numbers should be used to realise strategic infrastructure, placemaking and green network opportunities.
- 2.19 SEPA advised that flood risk should be given more consideration with a Strategic Flood Risk Assessment (SFRA) being produced alongside the Supplementary Guidance. On Question 3, SEPA advised that they cannot answer this question without comprehensive assessments of all allowances, for which detailed site boundaries would be necessary. Flooding and water management is of concern. SEPA understands that water and drainage infrastructure capacity has been taken into account when assessing infrastructure constraints. This assessment, however, only considers Scottish Water infrastructure and not other issues relevant to water management. The impacts of development on ground and surface water within South East Edinburgh for example and the potential for increased flood risk from inadequate drainage or a lack of integration of drainage between individual developments is of considerable concern to SEPA. An even greater housing land allowance in this area between the Edinburgh and Midlothian Council areas only emphasises the need for strategic SUDS to enable development in and between these two LDP areas.
- 2.20 Scottish Water advised that they fully support the Supplementary Guidance and, at the present time, have no other comments to make.

- 2.21 Historic Scotland responded to Question 4 advising that they have no specific comments to make in relation to the actual breakdown and distribution of the additional allowances within or outwith the SDAs. Historic Scotland did note that the allocation of additional housing land increases the potential for impacts on the historic environment which will require to be reviewed during the site allocation process by the relevant Local Authorities in the preparation of their LDP's.
- 2.22 Scottish Government advised that they are content and agree with Tables 3.1 and 3.2 subject to the queries raised under Questions 5 and 6. In relation to Question 5, the Government noted that without a clear understanding of the phasing of development and infrastructure provision, the impact on the deliverability of development that may require additional infrastructure is unclear. The failure of the process so far to provide a resolution that is supported by all stakeholders and delivers a clear mechanism, or mechanisms, for addressing cross boundary transport issues and funding contributions, and a suite of interventions shown to be deliverable, at least in part by such mechanisms, means that the deliverability of the infrastructure that might be necessary to support the overall spatial strategy is questionable.
- 2.23 Under Question 6, Transport Scotland advised that they would be in a position to engage with authorities to identify what mitigation might be appropriate to address the impact on the strategic transport network. It would then be possible to consider phasing of this mitigation, the levels of detriment that might be appropriate and to take an informed view on how cumulative impacts might be addressed through appropriate delivery mechanisms.
- 2.24 The comments raised by the key agencies are noted, however the issues raised by SNH, SEPA and Historic Scotland are outside the remit of the Supplementary Guidance which focuses on setting a housing land requirement for the SESplan area. Work is underway on an SFRA for the SESplan area to inform the Main Issues Report (MIR) for SDP2.

2.25 In terms of transport and infrastructure again work is underway and discussions ongoing between Transport Scotland, SEStran and the member authorities to further understand the issues and how they can be dealt with. All key parties, including the Scottish Government, will have a role in funding infrastructure in the SESplan region.

### **3. Responses and Proposed Editorial Changes**

---

3.1 As set out in Appendix B and Figure 3 above, the summaries of the responses were grouped into issues raised under subject headings – brownfield, completions, constrained, delivery, density, effective supply, further actions, general, generosity, green belt, housing assessments, infrastructure, key agency, landscape designations, paragraphs 3.8 and 3.9, policy, prime agricultural land, strategy, Tables 3.1 and 3.2 and windfall. Responses which raised particular LDP issues were categorised by Member Authority.

3.2 Each response, summary and issue was given full consideration as to whether the correct approach had been taken with the preparation, policy compliance and content of the Supplementary Guidance. The next step was to provide a considered officer response to the issues raised and to identify if any modifications should be made.

3.3 Whilst the responses requested many changes to be made on various issues, it is felt that the content of the Supplementary Guidance is the most appropriate outcome following the weighing up the planning considerations. Many wanted wholesale changes which would have not been in line with the strategy of the approved SDP and would have undermined the delivery of existing committed development. Many of the issues raised were also relating to specific sites and locations rather than wider strategic locations and are therefore more appropriate for the relevant LDP to address. These comments are available to the member authorities when considering their LDPs.

3.4 Nevertheless following a comprehensive review of the responses received and the draft Guidance it is proposed that some editorial changes are made to the Guidance itself and the accompanying Technical Note. The full detail of the changes is set out in Appendix C. In summary, these are:

- An expanded descriptive paragraph in the Supplementary Guidance explaining how the shortfall of meeting housing need that arises in Edinburgh will be met;
- Clarifying the role and justification behind identifying land outwith Strategic Development Areas;
- Editorial changes to Sections 5 and 6 of the Technical Note clarifying the methodology undertaken and that the Supplementary Guidance must accord with the approved Spatial Strategy; and
- Corrections to the Technical Note.

#### **4. Strategic Environmental Assessment and Habitats Regulations Appraisal**

---

4.1 Scottish Borders Council prepared the SEA and HRA on behalf of SESplan. This was considered at September 2013 Joint Committee. The Environmental Report was consulted upon at the same time as the Supplementary Guidance and was made available on the SEA Gateway and the SESplan Consultation Portal.

4.2 The Environmental Report and the analysis within it was based on updating the Environmental Report for the SDP. It assessed the potential impacts of the implementation of the housing land requirements and additional allowances on the nine environmental objectives of the SEA, in comparison to the SDP SEA.

4.3 This approach was discussed and agreed with the Consultation Agencies (SNH, Historic Scotland and SEPA) in advance of producing the report.

4.4 Responses from the Consultation Authorities resulted in making changes to the SEA monitoring framework, wording changes within the Environmental Report and changes to the impact assessment on air quality and cultural heritage. Full details on the consultation responses and changes are available in the Environmental Report in Appendix D.

4.5 The key findings of the SEA were potential impacts on:

- Air Quality – increased car emissions;
- Cultural Heritage – impact of development;
- Landscape and Townscape;
- Soil; and
- Water.

4.6 These impacts could be mitigated through measures that can be introduced through LDPs. These include:

- Locating development in locations accessible to sustainable transport;
- Taking a design-led approach to development in LDPs;
- Locating development to avoid impact on landscape designations;
- Protecting conservation areas;
- Prioritising brownfield sites; and
- Using sustainable urban drainage systems (SUDS).

4.7 Due to the strategic nature of the Supplementary Guidance more detailed impacts and mitigation measures will be identified as part of SEA work undertaken for LDPs.

- 4.8 The regulations require SESplan to produce an SEA Post Adoption Statement and publicise details of the adopted Supplementary Guidance and the accompanying Environmental Report. This will be done following adoption of the Supplementary Guidance. It is proposed to publicise this in the Scotsman rather than all individual local newspapers. This will result in a cost reduction.
- 4.9 HRA is a process to assess whether the proposals within a plan will cause likely significant effects (LSE) on European Sites within and outwith the SESplan area. The methodology builds on the HRA undertaken for the SDP.
- 4.10 As with the SDP HRA, it was found that there could be LSEs on European Sites but that a further assessment would be required at LDP level. This would determine the precise nature of these and any mitigation requirements that would arise as a result of the housing requirements of the Supplementary Guidance. The HRA sets out strategic mitigation measures that could guide development in LDPs.
- 4.11 The updated SEA Environmental Report and draft HRA Record can be found in Appendices D and E. The HRA Record is required to be considered draft until the Supplementary Guidance is adopted and no further changes are made. If Minister's direct that any changes should be made, it will require to be amended to reflect those. Following the adoption of the Supplementary Guidance, the HRA Record will need to be finalised and an SEA Adoption Statement published. The publication of the SEA Adoption Statement requires to be advertised.

## **5. Next Steps**

- 
- 5.1 Once approved by SESplan Joint Committee, Section 22 requires the Authority to send Scottish Ministers a copy of the Guidance they wish to adopt. Authorities must also send Ministers a Statement setting out the publicity measures they have undertaken, the comments received and an explanation of how these comments were taken into account.

- 5.2 Paragraph 143 and 144 of Circular 6/2013 (Development Planning) advises that, given that the principle of Supplementary Guidance will already have been established, scrutiny by Scottish Ministers is likely to focus more on ensuring that the principles of good public involvement and a proper connection with the SDP have been achieved consistently, rather than on detailed policy content. However, Ministers will not wish to allow Supplementary Guidance to be adopted which they consider significantly contrary to SPP.
- 5.3 Subject to approval by the SESplan Joint Committee, the minor editorial changes and the decision to submit, the Supplementary Guidance on Housing Land will require to be ratified by each of the member authorities. Member Authorities as well as ratifying these decisions will be required to adopt the Guidance at the expiration of the 28 day Ministerial consideration period unless Scottish Ministers direct otherwise. This process of ratifying the SESplan Joint Committee decisions at Recommendations 3 and 4 of this Report and adopting the Guidance in line with Recommendation 5 of this Report is anticipated to be concluded by the 15 May 2014.
- 5.4 Following ratification and adoption (subject to Ministerial consideration) the Supplementary Guidance will be submitted to Scottish Ministers on the 16 May 2014. After 28 days has elapsed (13 June 2013) and unless Scottish Ministers have directed otherwise, the Guidance will be adopted by each of the Member Authorities.
- 5.5 The process of preparing and adopting the Supplementary Guidance will therefore have been completed within the timescale set out in the SDP approval letter, where Scottish Ministers set out that they expected the Guidance to be adopted within 12 months from the date of approval of the SDP i.e. by no later than the 27 June 2014.

## **Appendices**

- 
- A** Summaries of Consultation Responses Received on the draft Supplementary Guidance on Housing Land

- B** Summary of the main issues raised by the Consultation Responses Received and SESplan Responses to the Consultation Responses Recieved on the draft Supplementary Guidance on Housing Land
- C** Proposed Editorial Changes to the draft Supplementary Guidance on Housing Land
- D** Strategic Environmental Assessment Environmental Report
- E** Habitats Regulations Assessment

### **Report Contact**

---

**Report Agreed By:** Ian Angus, SDP Manager

**Author Name:** Alice Miles / Graeme Marsden

**Author Job Title:** Lead Officer / Planner



**APPENDIX A**      Summaries of Consultation Responses Received on the draft  
Supplementary Guidance on Housing Land

The full responses are available to view and download at -

<http://sesplan-consult.objective.co.uk/portal/sg/hsgland>

Response ID	Respondee	Summary
<b>Question 1 - Do you agree that the Supplementary Guidance complies with Scottish Planning Policy? If not, why not? In what way does the Guidance need to change in order to comply with Scottish Planning Policy?</b>		
11	Regenco	Cannot identify constrained sites for development in plan period; The Waterfront is not a marketable or deliverable location for such development; Require allowance for flexibility in table 3.1; Winchburgh is a highly sustainable location.
12	Alfred Stewart Properties	Concern over delivery in Dunfermline
26	Liberton CC	Role of SDPA to confirm
43	SNH	No comment
50	Dr Tom Slater	No. Is not sustainable and supports development industry and landowners interests only.
57	Mr Scott Mackenzie	Yes
63	Gladman	Yes. Sets out distribution of housing requirement.
73	SEPA	Flood risk should be given more consideration with a Strategic Flood Risk Assessment being produced alongside the Supplementary Guidance.
78	SEPA	Blank
82	Musselburgh Conservation Society	Cannot be specific
92	Roslin & Bilston Community Council	More though needs to be given to meeting transport needs to new development in Midlothian. Current plans seem insufficient.
95	Cllr Dave Dempsey	Does not comply with public interest
103	Mr Grant McCulloch	Should wait until SPP review is complete
112	Murieston Community Council	Yes
122	Miss Carolyn Campbell	Cannot answer as review not complete
128	Mr Alan Harrison	Questions need for houses.
129	Banks Group	Welcomed compared to Proposed Plan
161	McTaggart & Mickel Homes	No. Housing demand not met where arising.
170	Scottish Government	Yes, subject to transport infrastructure concerns being met
177	Mansell Homes	No. Plan does not reflect economic/market reality by relying on sites and strategy from former plans that are no longer deliverable. Duplicate of 183.
183	TMS Planning Services	No. Plan does not reflect economic/market reality by relying on sites and strategy from former plans that are no longer deliverable.
189	Campion Homes	No. Plan does not reflect economic/market reality by relying on sites and strategy from former plans that are no longer deliverable. Duplicate of 183.
195	Muir Homes	No. Plan does not reflect economic/market reality by relying on sites and strategy from former plans that are no longer deliverable. Duplicate of 183.
208	Airthrie Estates	Does not comply with SPP as it does not link development to expected infrastructure delivery; additional housing is not directed to successful areas, such as West Lothian; West Lothian additional allowances are based on past movements trends and do not reflect opportunities to create sustainable new settlements.

Response ID	Respondee	Summary
215	Strawson Property	There is no explanation about the extent to which demand has been met. The SG does not explain openly and transparently how the distribution of Additional Allowances has been arrived at. The East Lothian additional allowance figure is arbitrary.
229	Grange and Prestonfield Community Council	Yes. SPP should allow for realistic SDPs.
232	Cockburn Association	Question the reliability of using projections. Welcome that Edinburgh constraints are recognised and that some demand can be met in
240	Mrs Linda Allison	Yes
242	Kalewater Community Council	Yes
249	Mrs Carol Smith	Requirement for 107,545 dwellings is not justified or based on robust data.
252	Haddington and District Amenity Society	Issues around capacity, design and deliverability
260	Barratt and David Wilson Homes	Guidance reflects the spatial strategy, SDP policy 5, and accords with SPP
268	Savills	Accords with SPP. Should require presumption in favour of sustainable development.
273	Dr David Mallon	What account has been taken of Fife Coastal Plan? Villages should be protected from development. Aberdour would not cope with increased traffic associated with development.
278	Dr David Mallon	duplicate of 273
281	Dr David Mallon	duplicate of 281
290	Mr Jon Grounsell	No. Process is driven by landowners and developers determining what is effective.
293	Balerno Community Council	Targets are unrealistic and will lead to development in protected Green Belt. Need to factor climate change and protecting agricultural land.
301	Trustees of the Foxhall Trust	Too much reliance on committed sites which are not effective and are not delivering completions. There should be a generous supply of new land.
307	EDI Brunstane	Scope to improve the SG references to SPP guidance on housing land and green belt
314	Straiton Parks Ltd.	Fails to consider deliverability of sites.
326	Mrs Ruth Schofield	Unrealistic targets will lead to development of unsuitable land.
339	Mrs Christine Shaw	Wait until SPP review is complete.
344	Mrs Gertrud Mallon	No. SG is contradictory to aims of SPP.
350	Mrs Maggie Pithie	Number of houses not justified. Alternative site status changed without notification or justification. Cammo NOT West Edinburgh. No regard for infrastructure or traffic issues. Massive negative impact on education provision. Plenty of brownfield sites available before this green belt site is stolen. Catastrophic impact on rare species.
351	Mrs Anna Purdie	No. SG is contradictory to aims of SPP.
363	Ogilvie Homes	Does not set out what the spatial strategy is. Does not seek to meet demand where it arises. fails to provide a reasoned and informed justification for the range of environmental and infrastructure constraints which are set out as the basis for the proposed geographical dispersal of the identified housing requirement.
369	Ashdale Land & Property	Does not set out what the spatial strategy is. Does not seek to meet demand where it arises. fails to provide a reasoned and informed justification for the range of environmental and infrastructure constraints which are set out as the basis for the proposed geographical dispersal of the identified housing requirement.
377	Mrs Elaine Hutchison	Unrealistic targets will lead to development of unsuitable land and won't align with sustainable development. SG must meet aims of Strategic Development Plan. Weight should be given to food production and protecting agricultural land.

Response ID	Respondee	Summary
383	Mrs Caitlin Hamlitt	Large housing requirement will require development in unsustainable locations. Pressure on councils to permit greenfield development. SG must meet aims of Strategic Development Plan. Weight should be given to food production and protecting agricultural land.
384	Mr Patrick Mitchell	No documentary train behind housing need
396	Mrs Angela Leask	Fails to take account of infrastructure in Coastal Fife, particularly Aberdour. Impact on already high traffic levels and amenity.
397	Mrs Angela Leask	Duplicate of 396
402	Mr Jon Watkins	Opposed to high housing requirement and development at Cammo. Green Belt should be protected. Cammo area infrastructure is over capacity. There are sufficient brownfield sites, the development of which should be subsidised.
413	Juniper Green Community Council	SPP is not clear on what a generous supply is.
425	Mr Paul Morris	Balerno is not suitable for large scale development due to infrastructure capacity issues. For Edinburgh, the area is poorly accessible and lack employment opportunities. Loss of green belt benefits including productive agricultural land. SG must meet the objectives of the SDP.
427	HPG Dalkeith	The SPG has relied on an update of the HNDA (Housing Need and Demand Audit), an analysis of the wider housing market and sub markets in terms of maintaining a 5 year land supply and an updated 'refresh' of the spatial strategy assessment. It is not considered that these matters have been sufficiently assessed nor are the outcomes adequately transparent in terms of their sustainable economic development rationale or consistency with underlying planning objectives. A lack of vision and ambition in relation to promoting economic recovery and aligning land finance and delivery across the SESplan area. It will not provide the basis for a maintenance of a 5 year supply of land at all times; The allocations proposed across the SESplan area and within South - East Edinburgh will not meet the principal aims and objectives of the SDP; The environmental constraints identified within the SDP are exaggerated and does not relate to the technical information or the policies within the SDP; Development economics within South East Edinburgh requires additional investment in order to provide essential infrastructure; Over-reliance on existing committed land which continues to fail to deliver; and Promoting Cauldcoats farm.
438	Mr James Poseley	Contradiction between brownfield priority and level of green belt development, including West Edinburgh.
440	Mr Blair Melville	Guidance now sets out a housing requirement based on a Housing Needs and Demand Assessment and shows this by Council/Local Development Plan area and by Strategic Plan time periods, all as required by SPP. It does not: seek to meet demand in the areas where it arises; set out alternatives or justify the preferred strategy; consider deliverability; ;set out a clear justification of the alleged environmental and infrastructure constraints; and set out a long-term spatial strategy. The spatial strategy and its implications are not clear.
449	IBG Stakeholders	There is too much reliance on committed sites and a broad based assumption of 83,207 dwellings being easily accommodated and built out. SPP warns against an over - reliance on committed sites when calculating the housing land requirement. This potentially compromises the SPP requirement to provide a generous housing land supply.
452	Banks Group	The SG fails to explain why only 100 of the 14,188 additional allowance required in excess of the Proposed Plan are capable of being accommodated in Midlothian.
455	Firrhill Community Council	Previous lower requirements are not being met, therefore are these achievable? Question the effective land supply process and developers/landowners role in it.
469	Miller Homes East Scotland	SG reflects a more compliant position with SPP. However, only if the distribution of new housing allocations creates opportunities for development in the right locations (marketable/accessible/sustainable) will SESplan and this SG be able to give clarity and confidence to the house building industry for committing to sites which will ensure delivery of housing units on the ground.
479	Mrs Blyth Peart	No comment

Response ID	Respondee	Summary
481	Strutt & Parker	Does not seek to meet need and demand in the areas that it arises, nor does it properly justify not meeting need and demand in the area it arises.
488	Dr Caroline Ritchie	Setting a target to build so many houses creates a tension between different aspects of that policy. Policies to promote sustainability and to protect agricultural and Green belt land are set against the reality that if the current fiscal climate persists, achieving the targets set will be highly dependent upon the involvement of the private sector. As their main concern is financial return for their shareholders rather than the best interests of the wider community, private companies engaged in housing development favour the use of greenfield sites in locations that will generate the most profit from their development. This frequently results in the building of houses which are not of the type that is most needed in locations which do not meet Scottish Government guidance on sustainability and are not the areas where housing is required. The Supplementary Guidance will put councils, in particular those who do not currently have the resources to subsidise the building of social and affordable housing, in the position where they are pressurised into consenting to planning applications in locations which are contrary to their own policies, in particular on high quality agricultural and Green belt land.
495	Persimmon Homes East Scotland	Partly by basing requirement on need and breaking down by LDP area. The strategy is not ambitious or succinct. More guidance should be given for the locations of allowances outside the SDAs. The justification of the strategy and the housing allowances is not clear. The SG should provide a generous supply, not a sufficient one. Deliverability has not been consider by locating development in areas where there is insufficient demand.
506	Stewart Milne Homes	In part by setting out a requirement by LDP area. But it does not: 1. seek to meet demand in the areas where it arises; 2. set out alternatives or justify the preferred strategy; 3. consider deliverability; 4. set out a clear justification of the alleged environmental and infrastructure constraints; and 5. set out a long-term spatial strategy. The strategy is not explicit and it does not set out the implications of not meeting demand where it arises.
513	Aberdour Community Council	No comment
517	Wallace Land Investment & Management	It provides no evidence of environmental and infrastructure constraints to justify why housing need and demand in the City cannot be met in full. The housing land requirement for each local development plan fails to take into account known market trends in redistributing households from City of Edinburgh to the neighbouring local authority areas. The Strategic Development Planning Authority (SDPA) has not sought to engage in partnership working with the house building sector to validate its conclusions. The SDPA must demonstrate that the proposed development strategy at the regional scale is sustainable and does not result in more commuting back to Edinburgh. The use of constrained land in the land supply calculations is contrary to SPP and SDP Policy 5. The use of additional allowances for 2019 to 2024 is contrary to SPP. The housing requirements should be modified to only allow a distribution of 19% of Edinburgh's need to other authorities. This is based on past market trends. Given the lack of compliance with SESplan SDP and SPP, it is requested that a Hearing is held to resolve the outstanding matters.
527	Hallam Land Management	It provides no evidence of environmental and infrastructure constraints to justify why housing need and demand in the City cannot be met in full. The housing land requirement for each local development plan fails to take into account known market trends in redistributing households from City of Edinburgh to the neighbouring local authority areas. It is not explained why Midlothian is the biggest receiver of redistribution from Edinburgh. The Strategic Development Planning Authority (SDPA) has not sought to engage in partnership working with the house building sector to validate its conclusions. The SDPA must demonstrate that the proposed development strategy at the regional scale is sustainable and does not result in more commuting back to Edinburgh. The use of constrained land in the land supply calculations is contrary to SPP and SDP Policy 5. The use of additional allowances for 2019 to 2024 is contrary to SPP. The housing requirements should be modified to only allow a distribution of 19% of Edinburgh's need to other authorities. This is based on past market trends. Given the lack of compliance with SESplan SDP and SPP, it is requested that a <u>Hearing is held to resolve the outstanding matters.</u>

Response ID	Respondee	Summary
529	Murray Estates	It does not meeting the requirements of SPP. Housing demand is not met where it arises. It does not meet sustainable growth objectives by requiring longer journeys between new homes a and jobs in Edinburgh. Disagree that the Edinburgh Green Belt should justify the redistribution of housing away from Edinburgh. It does not explain why Edinburgh, and specifically West Edinburgh, cannot accommodate more housing, and the sense is that the HoNDA redistribution has arisen from political expediency rather than a genuine attempt to strategically plan the City Region. Should not assume that constrained sites will contribute toward meeting need.
540	Taylor Wimpey	It does not meeting the requirements of SPP. Housing demand is not met where it arises. It does not meet sustainable growth objectives by requiring longer journeys between new homes and jobs in Edinburgh. Disagree that the Edinburgh Green Belt should justify the redistribution of housing away from Edinburgh as this will not lead to a sustainable settlement pattern. Should not assume that constrained sites will contribute toward meeting need.
547	Scottish Property Federation	The Supplementary Guidance reaffirms previous policy on housing allocations largely. Certain of the assumptions made in the Supplementary Guidance remain too optimistic in certain areas or are based upon notions of new housing completions that are unlikely to be achieved. This includes Edinburgh Waterfront.
550	Ashfield Commercial Properties LTD	Set out a summary of the examination. It is crucial that this SG is interpreted at the local level and that officers (and their Council members) do not maintain the status quo of simply relying on allocated sites/ commitments which are undeliverable in their current form.
565	Mr Morrison	Object to development of Green Belt land at Cammo and subsequent impact on traffic and transport infrastructure.
573	Mrs Christine Briffitt	No. The Supplementary Guidance directly contradicts many of the aims set out by Scottish Planning Policy by dictating the numbers they have to achieve despite incomplete or outdated reports and vague assessments
576	Mr Archibald Clark	No comment
583	Health & Safety Executive	Consultation not related to development near hazardous installations.
587	Cadzow Estate	No. Insufficient account has been taken of issues relating to the deliverability of a proportion of the existing sites and the real volume of current demand. The guidance is not fully compliant with SPP and does not provide a generous amount of housing land for building purposes. It will not provide the basis for a maintenance of a 5 year supply of land at all times. The allocations proposed across the SESplan area and within West Lothian will not meet the principal aims and objectives of the SDP. There is an over-reliance on existing committed land which has and continues to fail to deliver thereby reducing development potential. Not enough consideration has been given housing potential in West Lothian.
<b>Question 2 - Do you agree that the distribution of the housing land requirement across each of the six Member Authority areas set out in Table 3.1 is justified? Do you have any further comments on the distribution of the housing land requirement set out in Table 3.1 of the Supplementary Guidance?</b>		
13	Alfred Stewart Properties Ltd	Does not agree with Table 3.1. The Supplementary Guidance asserts there is a committed supply of 83,207. These figures are wholly inaccurate and give a misleading target. The Technical Note is wrong. Table 3.2 shows completions 2009 - 2019 incorrectly as 4,451, this figure should be 4,437. Paragraph 3.8 requires emerging LDPs to further examine land supply. It is inappropriate of the SDPA to abdicate this responsibility. If the process was undertaken in a robust manner the actual supply would be smaller and the actual housing land requirement larger as a result. The Supplementary Guidance uses unsubstantiated assertions for supply expected from constrained and windfall sites.
19	Regenco (Trading) Ltd	Paragraph 3.7 - There is an inconsistency in the manner in which the Supplementary Guidance deals with constrained land. These figures are wholly inaccurate and give a misleading target. The Technical Note is wrong. Table 3.2 shows completions 2009 - 2019 incorrectly as 4,451, this figure should be 4,437. Paragraph 3.8 requires emerging LDPs to further examine land supply. It is inappropriate of the SDPA to abdicate this responsibility. If the process was undertaken in a robust manner the actual supply would be smaller and the actual housing land requirement larger as a result. The Supplementary Guidance uses unsubstantiated assertions for supply expected from constrained and windfall sites.

Response ID	Respondee	Summary
27	Liberton and District Community Council (Mr Jim Henry)	Agree with Table 3.1. The allocations made are consistent with the numbers in the Scottish Ministers' Approval Letter for the period 2009 and 2024. Liberton and District Community Council agrees that there is justification for this allocation.
32	Craigshill Community Council (Mr Alexander Heggie)	Does not agree with Table 3.1. West Lothian is a small county and we as a community council think 11,420 new houses are too much. Craigshill is full up. We should be looking to protect agricultural land.
35	Milesmark and Baldrige Community Council (Mr Alex McLaren)	Does not agree with Table 3.1. Fife is already experiencing significant development and it appears that the plan from 2019 continues that trend. Scottish Borders appears to be under distributed, especially with the new rail link. This plan would ease traffic congestion, which is already significant into Edinburgh from Fife. East Lothian also appears to have capacity to take more of the share and is closely situated to Edinburgh, where most people in the area will take up employment.
40	Scottish Natural Heritage (Ms Vivienne Gray)	Agree with Table 3.1. SNH cannot comment on housing need and demand. However, meeting the housing land requirement is likely to impact on a number of natural heritage interests, including soils, habitats, species and landscape. Strategic consideration of natural heritage issues associated with the housing land requirement may help to avoid or mitigate some natural heritage impacts. Realising the opportunities for the natural heritage to be enhanced through provision of multi-functional green infrastructure that connects people and wildlife should also be identified within LDPs.
51	Dr Tom Slater	Does not agree with Table 3.1. There are enough empty homes in the City of Edinburgh to address the housing shortage. East Lothian is a rural county that will become urbanised. Prime arable land (some of the best in Scotland) should be protected. There are enough empty homes in Fife, Midlothian, Scottish Borders and West Lothian to address the housing shortage.
58	Mr Scott Mackenzie	Agree with Table 3.1.
65	Gladman Developments (Simon Dean)	Agree with Table 3.1. The distribution identified in Table 3.1 is justified as it takes into account the identified need across the SESplan area within the plan period, and seeks to allocate it across areas where it can be delivered. However, adjustments to the overall distribution should not be made on the basis of specific-site assessments carried out by local authorities.
74	SEPA (Mr Paul Lewis)	SEPA cannot answer this question confidently until an SFRA is completed and the distribution of housing land identified in Table 3.1 tested against it.
83	Mr Pau Sales	Does not agree with Table 3.1. The text relating to East Lothian includes comments that the coastal strip will not be suitable for much of the allocation. The coastal strip has the most effective and faster public transport links. The inland areas are poorly serviced and there are no proposals published that show how this will be addressed and improved.
84	Musselburgh Conservation Society (Mr Barry Turner)	Agree with Table 3.1. The distribution is justified only subject to the following provisos. Suitable Green belt opportunities must be taken up in Edinburgh and Midlothian in association with existing and potential public transport availability. Green belt must be protected where it serves a particular purpose. There must be recognition of capacity constraints relating to existing communities and their services and to town centres. There must be avoidance of conglomerations of development. Such unacceptable concentrations could well be possible around Wallyford, Tranent, Prestonpans and Longniddry in East Lothian. Rail transport improvements must be delivered in East Lothian to include more peak hour trains, a half hourly off peak service, a new station at East Linton and cross-Edinburgh peak hour trains. There should be a greater allocation to the eastern Borders area associated with a new station at or near Reston and an appropriate level of service to it by stopping trains between Edinburgh and Berwick. More jobs must be provided. There must be grade separation at Sheriffhall junction and improvements at the Old Craighall junction.
93	Roslin and Bilston Community Council (Margaret Littlewood)	Does not agree with Table 3.1. This is too heavy a burden for Midlothian. not only because of the transport problems but because much of the land is either marshy or undermined with coal or mine workings or sand or gravel pits. In particular the large number of houses allocated to Bilston in BN1 is inappropriate. Bilston itself has virtually no infrastructure and could not readily be geographically linked with the housing in question.

Response ID	Respondee	Summary
97	Cllr Dave Dempsey	Does not agree with Table 3.1. The figure for Fife has been artificially inflated on two counts. First, the GROS estimates of population growth, are not in line with reality. Second, the figure for Fife would have been lower if Edinburgh could have found the sites needed to meet its housing needs. It would be better to leave the excess as "tbd" and allow time for a better estimation of the true situation.
104	Mr Grant McCulloch	Does not agree with Table 3.1. There is already considerable land approved for development. The rate of development currently seen in Edinburgh (at about 900 completions pa) indicates that there is no demand either from purchasers or from developers. By creating an opportunity, such as green belt sites in West Edinburgh, developers will cherry pick sites over those which have been approved. There is no evidence to suggest that 29,500 houses are needed in Edinburgh. Nothing has changed in the social or economic situation since the MIR to justify these figures. There was no reason to include the Cammo fields in the West Edinburgh. It has no access to the tram, it is in transport poverty already, and has to contend with a transport infrastructure that barely works.
113	Murieston Community Council (Mr Davidson McQuarrie)	Does not agree with Table 3.1. The distribution of housing land requirement is disproportionately high for West Lothian set against City of Edinburgh, Midlothian and East Lothian. For example, it is anomalous that East Lothian has a much lower allocation of land requirement than Midlothian despite having a larger population. The need and demand for housing is predominately created by City of Edinburgh and should be delivered there. Meeting the demand from within City of Edinburgh would reduce the pressure on the existing transport structure. The City of Edinburgh should maximise the use of brownfield sites and greenfield within the City. Priority should be given to brownfield sites within existing built up areas.
119	Mrs Sally Chalmers	Does not agree with Table 3.1. There is plenty of land already allocated for development in Edinburgh which is still not being built on. Developers should be required and incentivised, if necessary, to build on the sites they already have. The green belt should be untouched.
123	Miss Carolyn Campbell	Does not agree with Table 3.1. The main focus for development in Edinburgh appears to be in the West and South East. Why? It is stated that brownfield sites should be used first, Cammo is Green Belt and why has it been upgraded from an "alternative" site?
130	Banks Group (Mr Alistair Landells)	Does not agree with Table 3.1. Slightly loaded against Midlothian and West Lothian.
139	Mr Alan Harrison	Does not agree with Table 3.1. Combining the West Edinburgh and Fife totals, the Forth bridge and roads into the city could not take the extra vehicles. It might be necessary to introduce big tolls on the bridges to make people use park and ride. Cammo estate was not a preferred site why is it being pushed forward?
145	Dr Simon Jackson	Does not agree with Table 3.1. There are plenty of unfinished developments suggesting that locally there is not the demand for housing.
162	Mactaggart & Mickel (Homes) Ltd (Mr Ken Hopkins)	Does not agree with Table 3.1. The City of Edinburgh still has not accepted its share of housing demand, requiring surrounding Local Authorities to accept more development than is necessary, which is not a sustainable approach to delivering housing need. Edinburgh Council should plan for at least 5,000 houses across the plan period. Supporting document submitted. There is no evidence to back up the assumptions made on windfall and constrained supply. Increasing densities as a mathematical exercise is simplistic.
168	Mactaggart & Mickel (Homes) Ltd (Mr Ken Hopkins)	Does not agree with Table 3.1. The City of Edinburgh Council area should accept more housing development over the plan period. Housing demand arises in the City of Edinburgh and therefore the most sustainable approach to delivering the required housing numbers is to provide more housing in this area than in the surrounding local authority areas. At least 5,000 additional houses should be provided for in the Edinburgh Council area over the plan period rather than in surrounding areas. Supporting document submitted. There is no evidence to back up the assumptions made on windfall and constrained supply. Increasing densities as a mathematical exercise is simplistic.
171	Scottish Government (Mrs Roseanne Leven)	Agree with Table 3.1, subject to the responses to questions 5 and 6 (Responses 174 and 175).



Response ID	Respondee	Summary
178	Mansell Homes	Does not agree with Table 3.1. The title of Table 3.1 is misleading. The figures relate to the number of houses required within the set timescales not the amount of land required to be allocated in order to deliver this level of development. The land requirement should, in accordance with SPP and good practice, be a factor of say 20% or more higher than the number of house units in order to ensure the provision of a generous and effective land supply in LDPs. LDPs should be required to plan for this higher land allocation level.
184	TMS Planning Services	Does not agree with Table 3.1. The title of Table 3.1 is misleading. The figures relate to the number of houses required within the set timescales not the amount of land required to be allocated in order to deliver this level of development. The land requirement should, in accordance with SPP and good practice, be a factor of say 20% or more higher than the number of house units in order to ensure the provision of a generous and effective land supply in LDPs. LDPs should be required to plan for this higher land allocation level. The principle of the re-distribution of the land requirements between LDP areas appears sound albeit it is considered that a greater proportion of the allocation should be directed towards Fife and East Lothian LDP areas with related reductions in Midlothian and Scottish Borders.
190	Campion Homes	Does not agree with Table 3.1, the title of which is misleading. The figures relate to the number of houses required within the set timescales not the amount of land required to be allocated in order to deliver this level of development. These are 2 entirely separate figures. The land requirement should be 20% or more higher in order to provide a generous and effective land supply. It is unclear where the value of redistributing housing numbers to the Scottish Borders lies. A greater proportion should be directed towards the Fife LDP area with related reductions in Midlothian and Scottish Borders.
196	Muir Homes	Does not agree with Table 3.1. The title of Table 3.1 is misleading. The figures relate to the number of houses required within the set timescales not the amount of land required to be allocated in order to deliver this level of development. The land requirement should, in accordance with SPP and good practice, be a factor of say 20% or more higher than the number of house units in order to ensure the provision of a generous and effective land supply in LDPs. LDPs should be required to plan for this higher land allocation level. The principle of the re-distribution of the land requirements between LDP areas appears sound albeit it is considered that a greater proportion of the allocation should be directed towards Fife and East Lothian LDP areas with related reductions in Midlothian and Scottish Borders.
201	Mr Peter Scott	Does not agree with Table 3.1. The allocation of 2,700 additional houses in the West Edinburgh SDA should be removed or substantially reduced, due to the potential impacts on traffic in West Edinburgh and constraints on the capacities of primary and secondary schools. Traffic issues resulting from housing allocations in parts of West Edinburgh SDA to the west of Maybury Road are not adequately identified or assessed and the SDP 'Action Programme' does not include adequate proposals to mitigate the effects of traffic generated by new housing in this area.
204	Mr Stuart Sinclair	Does not agree with Table 3.1 and particularly the figures for Edinburgh.
209	Aithrie Estates	Does not agree with Table 3.1. The distribution has not been justified. It is not accepted that there are infrastructure constraints, schools in particular, in West Lothian sufficient to downgrade its relative importance in the SESplan area. Infrastructure is being provided in the Winchburgh area both by central government and by the private sector. The Forth Replacement Crossing, junction 1a on the M9, the imminent opening of Edinburgh Tram, the proximity and ongoing development of Edinburgh Airport, the Edinburgh to Glasgow Improvement Scheme, the opening of Airdrie / Bathgate, the expansion of Ingliston park and ride are all factors that make sense of a focus on the east of the county and on the Winchburgh area in particular for additional development. Paragraph 5.37 of the Technical Note which states that Transport Scotland may have concerns over the cumulative impact of development on the M8 and M9 corridor, particularly Newbridge, is not understood. SESplan seeks to direct development to areas which can benefit from planned public transport provision, thus further encouraging modal shift. It is now for the agency to carry out the necessary improvements.

Response ID	Respondee	Summary
216	Strawson Property	The number of units for East Lothian is too low for the 2009 - 2019 period compared with the figures for the same period for the other LDP Areas within SESplan. There is proven demand for new housing in East Lothian. It is vital for the economic health of the capital city to ensure that there is sufficient land supply available in the areas of greatest demand.
228	Grange and Prestonfield Community Council (Mr Tony Harris)	Agree with Table 3.1. All comments and responses are limited to the possible impact on Edinburgh.
230	Northumberland County Council (Mrs Helen Drummond)	Agree with Table 3.1. Authorities on both sides of the border have historically acknowledged that local housing markets straddle it, and that the town of Berwick-upon-Tweed in particular, provides housing, employment and services to its rural hinterland, which stretches into the eastern Scottish Borders. The County Council considers that this relationship should be acknowledged in SESplan, as acknowledged in the current Northumberland Local Plan Core Strategy, and that the scale of new housing development in the Eastern Borders SDA should take into account Berwick-upon-Tweed's local 'strategic' role. The current Northumberland Local Plan Core Strategy, Preferred Options for Housing, Employment and Green Belt Consultation Document proposes the identification of land for an additional 900 houses in Berwick to 2031, in line with aspirations to maintain and strengthen Berwick's role as a main town serving a wide rural hinterland. No objection is raised to either the provision of an additional 160 houses in the Eastern Borders SDA or 80 across the Scottish Borders to 2024.
233	Mr Jeff Chalmers	Does not agree with Table 3.1. Edinburgh does not need the new numbers of houses being suggested. These houses cannot be justified. There is no justification for placing Cammo within "West Edinburgh". The area does not have the road or school infrastructure to support such a proposal. Brownfield should be the first choice rather than the green belt.
234	The Cockburn Association (Ms Marion Williams)	The current proposed LDP for the City of Edinburgh already goes beyond the level of development that we consider acceptable. Remain unconvinced that the figures within Table 3.1 are justified. Welcome the priority being given to development on brownfield land, but are disappointed that only a small additional amount has been identified. The SEA's overall assessment of the impacts of additional housing indicates that various negative impacts can be expected. We are concerned that these may have been understated e.g. The detrimental effects upon landscape quality, amenity for communities and cumulative losses of greenbelt land. Increased cumulative, carbon emissions arising from additional housing supply and associated infrastructure could have a significant negative effect on achieving the Scottish Government's aspiration of zero carbon emissions in the near future. We find the generally positive conclusions arising from vehicle emissions confusing. The transport appraisal indicates considerable constraints at congested junctions along the City Bypass at Sheriffhall and Straiton, which may be difficult to resolve, particularly the latter. And yet the Guidance appears to over-ride these constraints in order to meet additional housing land proposals at Shawfair and along the A701 corridor. For the avoidance of doubt, we are concerned that the proposed housing requirement risks creating significant pressure on important landscapes, Green Belt and agricultural areas around Edinburgh. This would be against Scottish Planning Policy which places importance on protecting and enhancing the character, landscape setting and identity of settlements, providing access to open space and conserving prime agricultural land.
243	Kalewater Community Council	Agree with Table 3.1.
250	Mrs Carol Smith	Does not agree with Table 3.1. The city is already densely populated. Question the scale of projected growth, brownfield sites have not been fully used, green belt land should be sacrosanct to maintain quality of life for existing population.
253	Haddington and District Amenity Society (HADAS) (Chairperson Karen Stevenson)	Does not agree with Table 3.1. Considerable concern about the allocations in the current LDP being met on land previously mined (Blindwells). East Lothian has already developed considerable new housing in the period 2009 - 2019, where other authority areas are well behind in meeting their requirements. If the brownfield capacity not available in East Lothian then farmland in areas around all villages and towns will be under pressure with no clear assessment of the capacity of these areas.

Response ID	Respondee	Summary
261	Barratt and David Wilson Homes	Does not agree with Table 3.1. Whilst the SESplan HNDA requirement has now been met in full, this has been achieved through accommodating a significant proportion (40%) of the assessed demand for Edinburgh within adjoining local authority areas, which are all required to accommodate significant increases. It is critical that locations nearest where the demand derives, i.e. Edinburgh, are considered ahead of more peripheral locations. Housing land supply must address the areas of greatest demand otherwise allocations will not deliver the supply of housing envisaged. Whilst maximising investment in the Waverley rail line is supported, the ability for these areas to facilitate over 10,000 more houses than HNDA requires appears excessive. It is considered that there is an over reliance on redirecting Edinburgh's demand to Midlothian and the Scottish Borders. Further land within the South East and West Edinburgh SDA's requires to be considered for release along with further land within the identified North-West / South-West areas linked to key transport corridors. Supporting document submitted.
267	Savills	Does not agree with Table 3.1. Insufficient land has been identified for the most sustainable location for additional housing. More land should be identified to the West of Edinburgh and flexibility should be built in to re-instate significant housing at the Waterfront should the proposals for renewable energy port facilities not come forward.
272	Mr Andrew Carnduff	Does not agree with Table 3.1. The figures appear not to recognise the need for housing near to employment. The need for housing to accommodate workers in the SESplan area is not currently nor in the immediate future, in Fife, it is in Edinburgh and the Lothian's. The distribution of proposed housing is therefore inappropriate. Agricultural land should be protected.
274	Mr Martin Bailey	Does not agree with Table 3.1. Within Edinburgh it is unclear why the Waterfront cannot take more dwellings. The City should accommodate more. Fife has an unfairly generous allocation of new houses. This will encourage commuting by road and rail. West Lothian is an area where industrial redevelopment is comparatively easy to achieve, it will require a greater number of new dwellings than the 23,848 allocated. It also has a fair amount of brownfield land ripe for housing. At one level, the calculations don't appear at another the figures are over-accurate, it is absurd to claim that Midlothian will require so precise a figure (2,371).
279	Dr David Malton	Does not agree with Table 3.1. A disproportionately large number has been allocated to Fife. Aberdour is a non strategic site yet it has been targeted for 60 houses. Aberdour already has traffic problems which deter visitors.
286	Mr Thomson	Does not agree with Table 3.1. The Edinburgh numbers are too high. There is a need to create additional employment in the area of the Borders Railway. More houses in Edinburgh will only aggravate the problems in this area.
295	Balerno Community Council (Mr Richard Henderson)	Does not agree with Table 3.1. The allocation of land must proceed on the basis of a proper analysis of sustainability. The City of Edinburgh's allocation is too high and should not extend beyond the current brownfield land supply. Should be protecting prime agricultural land, the greenbelt and landscape designations. This will ensure that current transport congestion is not aggravated, and the best future use of new transport provision.
302	Trustees of the Foxhall Trust (Mr Peter Carus)	Does not agree with Table 3.1. The proportion of homes identified in the City of Edinburgh LDP area is too low. Further land for housing should therefore be identified in the City of Edinburgh Area to meet the housing needs generated from within the City of Edinburgh. West Edinburgh, in general, could accommodate further new homes.
308	EDI Brunstane Final	Does not agree with Table 3.1. The housing market in the SESplan area is pressured. Question the figure for total supply and the resultant figure for additional units. There is insufficient explanation as to how the housing land supply has been calculated and how this is based on HLA 2012 data. Assumptions behind the contribution of windfall and constrained sites are not explained. The contribution of the 18,000 units at Leith Docks needs to be clarified. The large contribution from constrained sites within the City of Edinburgh raises ongoing concerns about delivery. The Guidance is drafted on the basis that a very significant increase in housing completion rates suddenly occurs, almost immediately. This is questioned. The Guidance needs to responsibly address the provision of strategic infrastructure.

Response ID	Respondee	Summary
315	Straiton Parks Ltd (Mr Rob Snowling)	In general terms agree with the approach. However, there is additional housing land capacity within the A701 SDA that should be allocated. There is scope to increase the housing land requirement for Midlothian in order to fulfil this objective. A buffer should be added to the land requirements identified in Table 3.1 to ensure that housing land requirements are met in the event that identified sites fail to come forward during the Plan period. There is a strong interrelationship between Edinburgh and Midlothian. Consideration should be given to increasing the housing land requirement for Midlothian instead of seeking to absorb this demand within Scottish Borders and Fife, where there is very little interrelationship with Edinburgh.
327	Miss Ruth Schofield	The principles applied when establishing SESplan should continue to be adhered to. Green belt land should be protected for future generations. Prime agricultural land should not be reallocated on a whim. Transport considerations need to be taken account. Impact on local community and ecology must be taken into account.
338	Mrs Carolyn Craig	Does not agree with Table 3.1. There seems to be a disproportionate amount allocated to Fife compared to other areas, particularly considering the need is for / in Edinburgh. The Borders could take more to support the introduction of a rail service to the Borders? Midlothian is useful as it has easy access to the Edinburgh City By-pass and there is a very small amount allocated to East Lothian although there is a rail link. A new town would have new infrastructure, facilities and amenities rather than overstretching the infrastructure of small villages along the coastline and other areas.
342	Mrs Christine Shaw	Does not agree with Table 3.1. There are still large numbers of brown field sites which are not being build on. Should more desirable areas become available e.g. green belt land, then developers will choose these sites over brownfield opportunities.
345	Mrs Gertrud Mallon	Does not agree with Table 3.1. The numbers allocated to Fife are disproportionately high. The infrastructure is not in place to cope with additional housing development, especially outwith SDAs.
352	Mrs Anna Purdie	Does not agree with Table 3.1. The number of housing allocations in Fife are disproportionate. There have been large amounts of housing development in the past years and the area does not have the necessary supporting infrastructure. Coastal towns need to be preserved.
360	Mr Kenneth Murray	Does not agree with Table 3.1. No satisfactory explanation as to why the allocation for Fife should be so high.
364	Ogilvie Homes	Does not agree with Table 3.1 since it cannot be reasonably justified. It has been clear from the outset that the plan has been prepared on the basis that the City of Edinburgh was unwilling to meet its own housing land requirement. The consequence being that a certain proportion of the identified requirement would require to be met within adjoining authority areas. Whilst further details have now been provided, this information still lacks the level of detail and substance which is reasonably required. In particular, no reasonable justification has been provided as to why such a significant proportion of the City of Edinburgh requirement has been exported. The Guidance is attempting to force house buyers to move to particular locations by preventing new housing being built in <u>those areas where they actually want to live.</u>
370	Ashdale Land and Property	Does not agree with Table 3.1 since it cannot be reasonably justified. It has been clear from the outset that the plan has been prepared on the basis that the City of Edinburgh was unwilling to meet its own housing land requirement. The consequence being that a certain proportion of the identified requirement would require to be met within adjoining authority areas. Whilst further details have now been provided, this information still lacks the level of detail and substance which is reasonably required. In particular, no reasonable justification has been provided as to why such a significant proportion of the City of Edinburgh requirement has been exported. The Guidance is attempting to force house buyers to move to particular locations by preventing new housing being built in <u>those areas where they actually want to live.</u>
375	Mrs Alison Stewart	Current proposals are for Fife to provide 43% of housing development outwith SDAs. This is extremely high and query whether such a high allocation is both justified and proportionate.
378	Mrs Elaine Hutchinson	Prime agricultural land, at a time when food security is becoming of increasing concern, should be protected. Greenbelt and landscape designations should also be protected.

Response ID	Respondee	Summary
386	Mr Patrick Mitchell	Does not agree with Table 3.1. The Guidance relies on the completion of the tram line to Leith for sufficient infrastructure linking down to Granton. This will significantly limit future development in Granton although this has the bulk of Edinburgh's allocated housing development. The numbers require housing completions to rapidly rise, this is unlikely to happen, but by this time large swathes of greenbelt land will be lost. The Guidance needs to focus development on the new Waverley line to Galashiels. This line is forecast to be significantly underused. Development in West Lothian needs to be considered in terms of existing road infrastructure capacity. The approach to Edinburgh from the west is at capacity and will not be able to take significant additional commuter traffic. The Guidance and the latest LDP for Edinburgh does not fully consider existing capacity issues at key junctions leading into Edinburgh.
393	Mrs Caitlin Hamlett	Does not agree with Table 3.1. Ensuring the additional housing land requirement for the City of Edinburgh will force the release of prime greenfield sites in unsustainable locations. The erosion of prime agricultural land, green belt and open space outwith the designated SDAs is of particular concern. Insufficient weight is given to the constraints of prime agricultural land, green belt, open space and landscape.
403	Mr John Watkins	Does not agree with Table 3.1. There is no need for the additional housing. It is grossly unfair on Edinburgh to take the highest number of houses. There are huge tracts of countryside that are not green belt outwith the city which could be developed if really necessary.
408	Burnside	Does not agree with Table 3.1. The Technical Note (Chapter 3) identifies Edinburgh, Fife, Scottish Borders and East Lothian as the areas of most need. Midlothian has been allocated too much. Edinburgh city has the highest need perhaps more high density housing could be built there.
414	Juniper Green Community Council (Mr Neil Ingram)	Does not agree with Table 3.1. The proposed distribution delivers the revised housing figures, but will put all authorities under pressure to find significant amounts of undeveloped land, including some green belt land, to meet the figures.
426	Mrs Susan Warwick	Does not agree with Table 3.1. The release of green belt to accommodate housing should be very carefully examined. The land at Cammo is prime arable land and should be preserved for the generations to come.
429	HPG Dalkeith Ltd	Does not agree with Table 3.1 since there is no evidence provided to justify the land distribution contained therein. The figures appear to be based on established and not effective land with no explanation of how that land will come forward. Further detail submitted in relation to a site at Cauldcoats Farm. Many sites identified within Midlothian are not effective. The actual figure for need and demand within Midlothian is an underestimate.
439	Mr James Poseley	Does not agree with Table 3.1. There is no justification or analysis of the housing need. The numbers have no links to future employment prospects or trends. There are serious environmental and infrastructure constraints in developing the Cammo area of West Edinburgh.
450	IBG Stakeholders (Mr. Peter Carus)	Does not agree with Table 3.1. Given that Edinburgh generates by far the most demand / need for new housing within the SESplan housing market, it is considered that the proportion of homes identified in the City of Edinburgh LDP is too low, being only 27% of the total housing land requirement 2009 - 2024. Further land for housing should therefore be identified in the City of Edinburgh Council area to meet the housing needs generated from within the City of Edinburgh. West Edinburgh in particular could accommodate further new homes.
454	The Royal Bank of Scotland (RBS)	Does not agree with Table 3.1. Given that Edinburgh generates by far the most demand / need for new housing within the SESplan housing market, it is considered that the proportion of homes identified in the City of Edinburgh LDP is too low, being only 27% of the total housing land requirement 2009 - 2024. Further land for housing should therefore be identified in the City of Edinburgh Council area to meet the housing needs generated from within the City of Edinburgh. West Edinburgh in particular could accommodate further new homes.
457	Firrhill Community Council (Mr James Napier)	Does not agree with Table 3.1. Do not consider that the housing land requirement identified in Table 3.1 is justified. New development proposals will undermine the delivery of housing on existing brownfield sites.

Response ID	Respondee	Summary
463	Banks Group (Mr Alistair Landells)	Does not agree with Table 3.1. Appears that the major release suggested for North West Edinburgh and South West Edinburgh will be most certainly required. Not clear how East Lothian will be able to meet this level of extra requirement. Fife numbers can be dealt with in theory but not based on any likelihood of deliverability. Simply no arithmetical justification is put forward to justify why Midlothian are only taking an extra 100 units. Allocations are already substantial in Scottish Borders and whilst the additional figure is very small (240) there is an argument that there is already sufficient allocations made. No arithmetical equation to justify West Lothian only taking an additional 370 units. The numbers are very confusing and deceiving.
466	Mrs Blythe Peart	Does not agree with Table 3.1. The requirement for extra land for housing in the other LDP areas is to meet the needs of the City of Edinburgh. Research from Bank of Scotland indicates that there are around 10,000 empty homes in Edinburgh. These should be brought back into use before releasing greenfield land.
468	Miller Homes East Scotland Ltd	Agrees with Table 3.1. The key issue will be for Fife to ensure that the additional allocations are identified in the right place. The Reporter in the Mid Fife Local Plan Examination considered the site at Gallows Knowe, Crossgates as meeting the tests of effectiveness in full.
482	Strutt and Parker (Mr John Wright)	Agree in part with Table 3.1. Further detail should be provided on the barriers and constraints to development in the Edinburgh City Area. This is the Capital of Scotland, and will need to grow to maintain its attractiveness to investment. Steps should be taken to remove barriers to development to prevent stagnation. Displacing development outwith the City serves to prevent delivery of affordable housing and results in house price increases and unsustainable patterns of in-commuting. Are supportive of the identification of SAA 9.
489	Dr Caroline Richie	Does not agree with Table 3.1. Concerned that areas designated for housing in the draft City of Edinburgh Local Plan involve good quality agricultural land. How will food security be maintained? Acknowledge that there may be a need to build upon the Green belt but concerned at the extent to which this is taking place.
496	Persimmon Homes East Scotland (Mr Gordon Johnson)	Does not agree with Table 3.1. There is no justification or explanation for the level of identified housing need and demand for Edinburgh which is being delivered outwith the City. Edinburgh should deliver more of its own housing need and demand.
507	Stewart Milne Homes C/o Holder Planning	Does not agree with Table 3.1. Approach to housing land distribution would start by asking whether the pattern of demand evidenced in a HNDA could be met. Assertions have been made that it may / will not be possible to meet demand arising in Edinburgh in or close to the city. The evidence for these assertions is clearly lacking. The Guidance proposes to deflect 35% of Edinburgh's demand elsewhere in the period 2009 - 2019, and 51% in 2019 - 2024. The re-assessment of capacities and constraints is weak. Little detail is available on the additional sites considered and little justification offered as to why West Edinburgh and East Lothian could not accommodate more. The assessment of SAAs 9, 10, 11, 21, 22, 23 is superficial.
514	Aberdour Community Council	Does not agree with Table 3.1. Fife has been allocated a disproportionate number of houses.
519	Wallace Land Investment & Management	Does not agree with Table 3.1. The figures are not fully explained or justified, with no supporting evidence provided. The methodology appears to identify the Additional Allowances first and then confirm a housing land requirement for each LDP area. This is contrary to SDP Policy 5 and SPP. The identification of Additional Allowances is not required. Redistributing 35% of Edinburgh's need and demand out of the City in the period 2009 - 2019 and 50% in the period 2019 - 2024 is unsustainable as it encourages commuting back into the City. The development strategy for the redistribution is random and not supported by economic growth or transport improvements. The strategy should follow the HMAA evidence redistributing 19% of Edinburgh's need and demand to East Lothian first followed by West Lothian, Midlothian and then Fife. The contribution from constrained sites is overstated. Supporting document including proposed modifications submitted.

Response ID	Respondee	Summary
528	Hallam Land Management	Does not agree with Table 3.1. The figures are not fully explained or justified, with no supporting evidence provided. The methodology appears to identify the Additional Allowances first and then confirm a housing land requirement for each LDP area. This is contrary to SDP Policy 5 and SPP. The identification of Additional Allowances is not required. Redistributing 35% of Edinburgh's need and demand out of the City in the period 2009 - 2019 and 50% in the period 2019 - 2024 is unsustainable as it encourages commuting back into the City. The development strategy for the redistribution is random and not supported by economic growth or transport improvements. The strategy should follow the HMAA evidence redistributing 19% of Edinburgh's need and demand to East Lothian first followed by West Lothian, Midlothian and then Fife. The contribution from constrained sites is overstated. Supporting document <u>including proposed modifications submitted.</u>
530	Murray Estates C/o Holder Planning	Does not agree with Table 3.1. The figures are not justified. The proposed distribution does not adequately reflect the patterns of demand and housing market analysis within the HNDA. The Guidance proposes to redistribute significant levels of Edinburgh's housing demand during the periods 2009 - 2019 and 2019 - 2024 primarily to Midlothian and Scottish Borders, and to a lesser extent Fife and East Lothian. This is not fully reflective of the housing market analysis undertaken. It is flawed to rely on the Scottish Borders to such an extent. The strategy will be undeliverable in terms of market demand.
541	Taylor Wimpey C/o Holder Planning	Does not agree with Table 3.1. The figures are not justified and does not reflect the patterns of demand and housing market analysis as presented by the HNDA. Selective account and application of infrastructure / environmental constraints appears to have been taken in reaching these conclusions. Redistributing significant levels of Edinburgh's housing demand is not fully reflective of the housing market analysis undertaken. The reliance on Scottish Borders is flawed. There is a risk the strategy will be undeliverable.
548	Scottish Property Federation (Mr David Melhuish)	Does not agree with Table 3.1. Further planned expansion of housing allocations is feasible and desirable in the City of Edinburgh area. Question whether Fife will be able to deliver the housing identified. In West Lothian there is significant investment in the <u>Winchburgh area but this will need to be supported by progress with infrastructure improvements.</u>
551	Ashfield Commercial Properties Ltd	The greatest challenge lies at the local level where sites for these additional allowances must be found. Concur with the view that those authorities best placed, strategically to deliver additional housing, take a proportion of the City's need and demand in addition to meeting their own housing need and demand, such as East Lothian. As no significant brownfield sites have been identified, <u>greenfield sites have to be included.</u>
558	Mr Nick Lansdell	Does not agree with Table 3.1. The proportion of housing required from West Lothian is not supported by the availability of infrastructure. Creating housing in support of the City creates an unsustainable environment impact and an impact on quality of life for West Lothian residents who are increasingly living not in a semi-rural environment but a series of sprawling conurbations. <u>The numbers for West Lothian should be reduced.</u>
566	Morrison	Does not agree with Table 3.1. There is no satisfactory explanation or justification for the increase in the numbers. Justification of the specific areas to be included particularly the proposed use of existing Green Belt land should be provided.
577	Mr Archibald Clark	Does not agree with Table 3.1. The HNDA figures are based on GROS which are themselves based on estimates, trends and migration and take no account of the change in the economic situation that has developed since. It is unwise to be identifying land beyond a 10-year period since such figures become progressively more unrealistic. The major conurbations in the central belt are spreading out into good quality agricultural land. Densities should be increased. The assumption that 'family-size' houses are needed is not borne out by the statistics. Should be looking at existing infrastructure (roads, sewers, gas, electricity, school and shopping provision) to support new / replacement housing rather than extending the roads to new sprawling low-density estates.
588	Cadzow Estate	Does not agree with Table 3.2. Do not agree that West Lothian is in any way self-contained. Concerned that the provision of sufficient housing to supply the 'cross Plan' requirement created by the Gyle / Airport / Newbridge / Livingston employment corridor has not been adequately addressed. Despite this corridor being a primary economic driver for the region the requirement assessed for West Lothian appears to be very conservative and out of kilter with some of the other plan areas.

Response ID	Respondee	Summary
<b>Question 3 - Do you agree with the breakdown by Strategic Development Area as shown in Table 3.2 of the Supplementary Guidance? Do you have any further comments on the additional allowances by Strategic Development Area set out in Table 3.2 of the Supplementary Guidance?</b>		
9	Ms N Clarke	Does not agree with Table 3.1. The rapid urbanisation of East Lothian has had a detrimental effect on public transport systems, schools and healthcare. Continually building on greenfield sites severely damages the environment, biodiversity, food security and quality of life. A railway is being built in the Borders yet they have only been allocated a limited number of houses.
14	Alfred Stewart Properties Ltd	Paragraph 3.7 - There is an inconsistency in the manner in which the Supplementary Guidance deals with constrained land. These figures are wholly inaccurate and give a misleading target. The Technical Note is wrong. Table 3.2 shows completions 2009 - 2019 incorrectly as 4,451, this figure should be 4,437. Paragraph 3.8 requires emerging LDPs to further examine land supply. It is inappropriate of the SDPA to abdicate this responsibility. If the process was undertaken in a robust manner the actual supply would be smaller and the actual housing land requirement larger as a result. The Supplementary Guidance uses unsubstantiated assertions for supply expected from constrained and windfall sites.
20	Regenco (Trading) Ltd	Paragraph 3.7 - There is an inconsistency in the manner in which the Supplementary Guidance deals with constrained land. These figures are wholly inaccurate and give a misleading target. The Technical Note is wrong. Table 3.2 shows completions 2009 - 2019 incorrectly as 4,451, this figure should be 4,437. Paragraph 3.8 requires emerging LDPs to further examine land supply. It is inappropriate of the SDPA to abdicate this responsibility. If the process was undertaken in a robust manner the actual supply would be smaller and the actual housing land requirement larger as a result. The Supplementary Guidance uses unsubstantiated assertions for supply expected from constrained and windfall sites.
28	Liberton and District Community Council (Mr Jim Henry)	Agree with Table 3.2. The Scottish Ministers' Approval Letter gives priority to the development of brownfield land and to land in the thirteen SDAs. The increase in the South East Edinburgh SDA on the face of it appears excessive. However, the increases in some of the other SDAs are much greater. However paragraph 3.10 indicates that it is the role of LDPs to identify how much housing land should be allocated to the SDAs placing in question the value of Table 3.2. This means that should City of Edinburgh deem it acceptable the South East Edinburgh SDA could be expected to take more than 2,500. The intentions of City of Edinburgh will not be known until June 2014 at the earliest. The approach in paragraph 3.10 is wrong. SESplan should play its strategic planning role and be the vehicle for setting the housing land targets within its area. Liberton and District Community Council is prepared to accept the allocation of 2,500 houses in the South East Edinburgh SDA for the period 2009 - 2024 as a maximum number. No additional houses should be allocated to this SDA over the period to 2032.
33	Craigshill Community Council (Mr Alexander Heggie)	Does not agree with Table 3.2. West Lothian is too small a county for a large number of new houses. Most of West Lothian is good agricultural land and the increase of new houses is going to take up too much land. An increase in population is going to need more food.
36	Milesmark and Baldrige Community Council (Mr Alex McLaren)	Does not agree with Table 3.2. North Dunfermline already has an agreed plan for significant development. It would appear that there are other areas closer to the M90 that haven't been considered within Fife e.g. Kelty, Kinross and Southern Dunfermline. The allocation seems to be overtly biased to one area of Dunfermline.
39	Craigshill Community Council (Mr Alexander Heggie)	Does not agree with Table 3.2. There is not enough brown land sites to build all those houses. Good farm land is needed to grow food for the rising population, that is disappearing fast. West Lothian has good agricultural land for crop growing this should be protected.
44	Scottish Natural Heritage (Ms Vivienne Gray)	Agree with Table 3.2. The distribution of housing numbers in the SDAs should be used to realise strategic infrastructure, placemaking and green network opportunities. Collaboration will be required. The Guidance presents an opportunity to set a strategic direction for maintaining green belt character and function in and around areas proposed for development. SNH recommend that the Guidance should set out written or spatial requirements for strategic green infrastructure provision within the green belt.



Response ID	Respondee	Summary
52	Dr Tom Slater	Does not agree with Table 3.2.
59	Mr Scott Mackenzie	Agree with Table 3.2.
66	Gladman Developments (Simon Dean)	Agree with Table 3.2. It is important that SESplan sets out how the full, assessed need will be provided for across the SDP area. This will give the relevant authorities the information they need to produce LDPs to begin to address the housing needs in their areas. The breakdown by SDA will also assist in identifying where additional sites are required in order to meet those needs.
75	SEPA (Mr Paul Lewis)	SEPA cannot answer this question without comprehensive assessments of all allowances, for which detailed site boundaries would be necessary. Flooding and water management is of concern. SEPA understands that water and drainage infrastructure capacity has been taken into account when assessing infrastructure constraints. This assessment however, only considers Scottish Water infrastructure and not other issues relevant to water management. The impacts of development on ground and surface water within South East Edinburgh for example and the potential for increased flood risk from inadequate drainage or a lack of integration of drainage between individual developments is of considerable concern to SEPA. An even greater housing land allowance in this area between the Edinburgh and Midlothian Council areas only emphasises the need for strategic SUDS to enable development in and between these two LDP areas.
85	Musselburgh Conservation Society (Mr Barry Turner)	Does not agree with Table 3.2. Numbers should be increased to reflect potential public transport improvements. The numbers in East Lothian can only be justified subject to the following provisos. Suitable Green belt opportunities must be taken up in Edinburgh and Midlothian in association with existing and potential public transport availability. Green belt must be protected where it serves a particular purpose. There must be recognition of capacity constraints relating to existing communities and their services and to town centres. There must be avoidance of conglomerations of development. Such unacceptable concentrations could well be possible around Wallyford, Tranent, Prestonpans and Longniddry in East Lothian. Rail transport improvements must be delivered in East Lothian to include more peak hour trains, a half hourly off peak service, a new station at East Linton and cross-Edinburgh peak hour trains. There should be a greater allocation to the eastern Borders area associated with a new station at or near Reston and an appropriate level of service to it by stopping trains between Edinburgh and Berwick. More jobs must be provided. There must be grade separation at Sheriffhall junction and improvements at the Old Craighall junction. There is an intact disused railway line that serves the northern end of the A701 corridor. This could become part of an extended tram network at minimum cost if trams are to run to the Royal Infirmary and thus could open up areas to development.
98	Cllr Dave Dempsey	Does not agree with Table 3.2. Comments relate to North Dunfermline and Ore / Upper Leven Valley SDA. It's for Fife to determine the breakdown in a manner that's open to public scrutiny. The document is too obscure and opaque to allow the lay public to take a sensible view.
105	Mr Grant McCulloch	Does not agree with Table 3.2. The current green belt is robust and it is clearly defined by the Maybury Road, and city by-pass. The IBG proposal is accepted, but the rest of the green belt around West Edinburgh should be left as it is. There has been no good explanation as to why the substantial increases from the MIR and Proposed Plan are now sought. Encroachment onto the green belt should not be allowed without justification.
114	Murieston Community Council (Mr Davidson McQuarrie)	Agrees with Table 3.2.
124	Miss Carolyn Campbell	Does not agree with Table 3.2. The Cammo site is on Green Belt land and if it is lost to housing it will be the start of a gradual erosion off the green belt in the west of Edinburgh. The Maybury / Barnton road cannot cope with the present volume of traffic. There will also be more traffic coming into west Edinburgh when the new Forth crossing is completed.
131	Banks Group (Mr Alistair Landells)	Agrees with Table 3.2.
132	Banks Group (Mr Alistair Landells)	As Response 131.

Response ID	Respondee	Summary
140	Mr Alan Harrison	Does not agree with Table 3.2. The roads are full to capacity hence traffic control on A90 into and out of city at rush hour, there are no schools, doctors, dentists available. The tolls on the bridge should be £5 to reduce traffic and encourage park and ride for the extra houses in Fife.
146	Dr Simon Jackson	Does not agree with Table 3.2. There are plenty of unfinished developments suggesting that locally there is not the demand for housing. Cammo is not West Edinburgh. Roads / schooling / GPs etc are not in the area locally to support all the extra housing.
163	Mactaggart & Mickel (Homes) Ltd (Mr Ken Hopkins)	Does not agree with Table 3.2. 5,000 new houses should be provided for across the Edinburgh area. Supporting document submitted. There is no evidence to back up the assumptions made on windfall and constrained supply. Increasing densities as a mathematical exercise is simplistic.
172	Scottish Government (Mrs Roseanne Leven)	Agree with Table 3.2. Content, subject to your responses to questions 5 and 6 (Responses 174 and 175)
179	Mansell Homes	Does not agree with Table 3.2. The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit in allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs. There are many smaller settlements in accessible parts of Fife with capacity.
185	TMS Planning Services	The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit in allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs. There are many smaller settlements in accessible parts of Fife with capacity.

Response ID	Respondee	Summary
191	Campion Homes	<p>Does not agree with Table 3.2. The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit in allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs. There are many smaller settlements in accessible parts of Fife with capacity.</p>
197	Muir Homes	<p>Does not agree with Table 3.2. The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit in allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs. There are many smaller settlements in accessible parts of Fife with capacity.</p>
210	Aithrie Estates	<p>Does not agree with Table 3.2. The breakdown by SDAs and in particular the use of one SDA across West Lothian is flawed. It is the role of the SDP to give guidance to the LDP. Leaving the decision solely to the LDP as to the locations which will best achieve house completions is an abrogation of responsibility. Flexibility is hardly relevant in dealing with what can only be described as a crisis from delaying the process for many years. This delay has contributed to the massive backlog in the supply of housing land and particularly completed homes. It is incumbent on the SDPA to devise a plan which gives the best chance of achieving a step change in house completions by 2019 and then by 2024. The developers behind large developments in West Lothian are at considerable risk. Because the housing numbers were derived from calculations of historic need, no thought was given to what would be an economic scale of development standing the significant contributions to schools and other infrastructure required of the developers. The LDP should be set the task by SESplan and the SG of making further allocations of new housing land that will maximise output and thus instil confidence and make best use of the planned new infrastructure for which the developers have to pay.</p>

Response ID	Respondee	Summary
217	Strawson Property	Does not agree with Table 3.2. A greater proportion of the Additional Allowance should be directed towards East Lothian to reflect the higher demand for new housing within the East Lothian SDA compared with other SDAs.
227	Grange and Prestonfield Community Council (Mr Tony Harris)	Agree with Table 3.2.
231	Mr Jeff Chalmers	Does not agree with Table 3.2. Edinburgh does not need the new numbers of houses being suggested. These houses cannot be justified. There is no justification for placing Cammo within "West Edinburgh". The area does not have the road or school infrastructure to support such a proposal. Brownfield should be the first choice rather than the green belt.
235	The Cockburn Association (Ms Marion Williams)	Do not agree with Table 3.2 which would lead to unacceptable pressures on the Green Belt. West Edinburgh - The allocation has increased from 1,000 units to 2,700. As there are significant constraints in this area, it is not clear how the increase of 1,700 units is to be achieved - more land take (Green Belt)? - higher density? - combination of both? South East Edinburgh - The allocation has increased from 850 units to 2,500. Comments as for West Edinburgh SDA, with strong concerns as the scenic Edmonstone Hill. A701 Corridor - Allocation increased from 500 to 750, despite severe transport constraints, green belt damage and coalescence issues.
244	Kalewater Community Council	Agree with Table 3.2.
251	Mrs Carol Smith	Does not agree with Table 3.2. West Edinburgh - Bears a disproportionate share of proposed development. Brownfield sites in city centre not used. West Lothian and A701 corridor more suitable. Edinburgh City Centre - Brownfield sites and unused land in city centre should be used where infrastructure already in place - no allocation is made for these sites, why? A701 Corridor - Only 701 houses allocated, this area could absorb far more. West Lothian - Many areas in west Lothian are underused and of little landscape value. Areas of defunct industrial use could be rehabilitated.
254	Haddington and District Amenity Society (HADAS) (Chairperson)	Nothing to add. See Response 253.
262	Barratt and David Wilson Homes	Does not agree with Table 3.2. A reduced allowance within North Dunfermline and the Ore / Upper Leven Valley should be made due to deliverability concerns within the pre-2019 period. Several of the local authorities, namely Fife (additional 6,000 units), Edinburgh (additional 4,700 units) and East Lothian (additional 2,810 units) have all had to accommodate significant further housing in the period to 2024. However, notwithstanding the Spatial Strategy Assessment review the Guidance and Technical Note does not seem to infer significant new areas have been identified. The majority of the housing land allocations have already been identified in Midlothian and the Scottish Borders. The increased allowance for East Lothian is substantial but the majority of the area remains highly marketable and has the highest potential to deliver outwith Edinburgh. Additional allowances for West Lothian are acceptable based on balancing new sites with existing provision. Further medium scale sites are required to deliver the strategy. The main concern is Fife, where an additional 7,800 houses to 2024 are added, with significant deliverability concerns. The allowances for Edinburgh should be increased further in terms of North-West / South-West and the SDA areas. Supporting document submitted.
269	Savills	Does not agree with Table 3.2. As it is a more sustainable location, more housing should be directed to West Edinburgh. Flexibility should also be built in to allow for more housing at Edinburgh Waterfront should proposals for renewable energy port facilities not come forward as currently planned.
285	Mr Thomson	Does not agree with Table 3.2. The broad statement West Edinburgh hides the need to be more specific about the particular areas which have been identified. This area is green belt and should be protected.

Response ID	Respondee	Summary
287	Yeoman McAllister Architects (Mr Mark King)	Does not agree with Table 3.2. There are sites within and outwith Edinburgh that either have disused open space or have consents for a use which there is no demand. These sites could be used to increase housing supply and avoid greenbelt and countryside release. Sites closer to the airport and along local rail systems would provide a better solution for development than to ruin the East Coast and its village / golf course and coastal pattern. Distribution of East Lothian's allocation should be to other areas such as the Borders and Edinburgh's villages and west airport side. Obvious capacity exists between the existing north settlement boundary of Ratho and the M8.
291	Mr Jon Grounsell	Does not agree with Table 3.2. There is no mechanism in the system to stipulate density. Failing to build in the city centre at maximum density has massively adverse impacts on loss of greenfield land elsewhere and creates unsustainable transport patterns. Minimum density levels should be set throughout the Leith area and Granton at 4 - 5 storeys high. Opportunity to build on higher ground of low agricultural value to the South East of Rosewell. There is very limited capacity to build on the A701 corridor without damaging the separation between towns and high quality landscape - not recognised in the draft Midlothian LDP. Much greater focus on brownfield land is required.
304	Trustees of the Foxhall Trust (Mr Peter Carus)	Does not agree with Table 3.2. A significant proportion of land committed for housing in Edinburgh (and elsewhere in the SESplan area) is constrained, will be subjected to further delays and may not come forward at all. The need for only an additional 24,338 homes is questioned and is considered to be short of a more credible additional housing allowance needed to meet the overall housing land requirement and ensure the allocation of a generous land supply. Land in Kirkliston on the edge of the West Edinburgh SDA could help to deliver new housing.
309	EDI Brunstane Final	Does not agree with Table 3.2. SPP outlines the purpose of green belt designation. Consider that it is entirely appropriate at the point in the Development Plan cycle where strategic and local policy are under review, to undertake a more radical review of green belt boundaries. Brunstane, as a strategic site (up to 1,200 units) within the established South East Edinburgh SDA should be afforded a specific mention in the Supplementary Guidance. There is a strong policy presumption in SESplan that the SDAs are the priority locations for growth, in comparison to any areas outwith them. Strategic housing development should be located as close to Edinburgh as possible, in locations which are highly accessible by public transport, rather than further afield.
316	Straiton Parks Ltd (Mr Rob Snowling)	Does not agree with Table 3.2. Fully support the identification of land within the A701 corridor for 750 homes. However this scale of housing requirement fails to acknowledge the potential capacity of land at West Straiton (within the A701 corridor) to accommodate housing growth as part of a sustainable mixed-use development. We also consider that this scale of development is insufficient to deliver the A701 Bypass. The A701 Corridor SDA has significant capacity for additional residential development and its housing requirement should be increased to reflect this.
325	Friends of Cammo (Mr Simon Gillam)	Does not agree with Table 3.2. If the Edinburgh LDP continues to rule out areas south of the A8 for housing development, 2,700 new houses could not be accommodated in West Edinburgh SDA without adverse effects on Cammo Estate.
340	Mrs Carolyn Craig	Does not agree with Table 3.2.
365	Ogilvie Homes	Does not agree with Table 3.2. On the basis of the information which is set out both within the Guidance itself and its associated Technical Note, it is simply not possible to establish if the breakdown of the housing land requirement detailed in Table 3.2 is reasonable or otherwise. The Guidance, has significantly over estimated the contribution from constrained sites. The Guidance must set out a firm and positive commitment to the identification of new sites to augment the established supply in order to ensure that the <b>requirement to maintain, at all times, a generous supply of housing land can be met.</b>
371	Ashdale Land and Property	Does not agree with Table 3.2. On the basis of the information which is set out both within the Guidance itself and its associated Technical Note, it is simply not possible to establish if the breakdown of the housing land requirement detailed in Table 3.2 is reasonable or otherwise. The Guidance, has significantly over estimated the contribution from constrained sites. The Guidance must set out a firm and positive commitment to the identification of new sites to augment the established supply in order to ensure that the <b>requirement to maintain, at all times, a generous supply of housing land can be met.</b>

Response ID	Respondee	Summary
379	Mrs Elaine Hutchinson	Does not agree with Table 3.2. Development at any cost must be sustainable respecting the needs of the environment.
388	Mr Patrick Mitchell	Does not agree with Table 3.2. The additional allowances for Edinburgh appear contrary to the stated policy of focussing development in 3 main areas. The numbers for South and West Edinburgh should be reduced to the previous levels and the plan amended to encourage development across the city (rather than focussed in a few locations) to minimise infrastructure strain. The Guidance appears to focus on development at all costs to significantly expand Edinburgh, without clearly identifying the demand.
404	Mr John Watkins	Does not agree with Table 3.2. The West Edinburgh area should be hugely reduced in favour of all the other areas outwith Edinburgh where there is considerably more land available (if all these units are really necessary at all).
410	Burnside	Duplicate Response. See Response 408.
415	Juniper Green Community Council (Mr Neil Ingram)	Agrees with Table 3.2. The required extra numbers will be difficult to achieve, but at least these areas have access to the planned improvements to infrastructure necessary for significant development set out in the draft Local Plan.
420	The Crown Estate (Mr Robert Murphy)	Agree with Table 3.2. A response including supporting documentation related to Sites R3 and R5 within Rosewell was submitted to the Midlothian MIR process.
421	Mr Keith Doig	Does not agree with Table 3.2. There is no justification for Cammo being included in "West Edinburgh". There is very little regard for the lack of infrastructure and traffic issues which will result. Existing schools are already at full capacity. There is a huge number of brownfield sites available for building. The Cammo fields / estate are home to a great deal of wildlife, much of it endangered.
422	Mr James Poseley	Does not agree with Table 3.1. Intent on putting houses in West Edinburgh without proper consideration of the need for houses and infrastructure and environmental issues. The Cammo fields are a source of natural beauty and wildlife. Allocations should be made within Edinburgh City Centre and at Edinburgh Waterfront.
423	Mr James Poseley	Duplicate Response. See Response 422.
430	HPG Dalkeith Ltd	Does not agree with Table 3.2. It is not clear where the breakdown has emerged from. The refresh of the Spatial Strategy Assessment is subjective arbitrary and contradicts statements made in MIRs and Proposed LDPs. There are doubts as to the effective supply.
442	Old Road Securities Plc (Mr Robert Murphy)	Agrees with Table 3.2. A response was submitted to the Midlothian MIR process on Site G1 (Redheugh West).
443	Cramond and Barton Community Council (Dr Patricia Eason)	Does not agree with Table 3.2. The additional 2,700 units in West Edinburgh cannot be justified. The allocation would further exacerbate peak traffic congestion. Major investment in new primary and secondary school facilities will be required.
451	IBG Stakeholders (Mr. Peter Carus)	Does not agree with Table 3.1. A significant proportion of land committed for housing in Edinburgh (and elsewhere in the SESplan area) is constrained and will be subjected to further delays. The need for only an additional 24,338 homes is questioned and is considered to be short of a more credible additional housing allowance needed to meet the overall housing land requirement and ensure the allocation of a generous land supply. Land in West Edinburgh which could help to meet housing needs.
456	The Royal Bank of Scotland (RBS)	Does not agree with Table 3.2. RBS supports the identification of West Edinburgh as an SDA. A significant proportion of land committed for housing in Edinburgh (and elsewhere in the SESplan area) is constrained and will be subjected to further delays. The need for only an additional 24,338 homes is questioned and is considered to be short of a more credible additional housing allowance needed to meet the overall housing land requirement and ensure the allocation of a generous land supply. Land in West Edinburgh which could help to meet housing needs.
458	Firrhill Community Council (Mr James Napier)	Agree with Table 3.2. Need to consider whether the green belt should be retained or not. Continued erosion will lose all control.
464	Banks Group (Mr Alistair Landells)	Agree with Table 3.2. See Response 463.

Response ID	Respondee	Summary
467	Mrs Blythe Peart	Does not agree with Table 3.2. The additional allowance along the Borders Rail Corridor appears to be minimal. There are greater opportunities to build-in capacity for additional housing, than with the ECML which only has capacity in its current form for the next 12 years.
470	Miller Homes East Scotland Ltd	Does not agree with Table 3.2. The settlement of Crossgates is located in neither the Fife SDAs. The Ore / Upper Leven Valley SDA is focused on a corridor that would not be attractive to house builders.
483	Strutt and Parker (Mr John Wright)	Agree in part with Table 3.2. The displacement of housing numbers from Edinburgh is not properly justified. Are supportive of the identification of SAA 9.
497	Persimmon Homes East Scotland (Mr Gordon Johnson)	Does not agree with Table 3.2. The numbers are not clearly justified. On what basis has the reprogramming of brownfield land in Edinburgh taken place? There is no evidence to state how the constrained supply has been calculated. If aiming to deliver a generous supply the housing land requirement should be higher by up to 20%.
502	Miss Sally McKenzie	Does not agree with Table 3.2. Existing brownfield sites appear to have been left out of the equation. There appears to be a significant disparity between the breakdown required for Fife and other regions. Fife should have less do a burden than that currently allocated.
509	Stewart Milne Homes C/o Holder Planning	Does not agree with Table 3.2. This approach is potentially-misleading. The SDP should simply set out the housing requirement to be met. The task of demonstrating how the requirements can be met should fall to the LDP. The Guidance makes unsubstantiated assertions about constrained sites and potential windfall contributions. Paragraph 3.9 does not accord with SDP Policy 7 as amended by Ministers.
515	Aberdour Community Council	No specific opinion.
521	Wallace Land Investment & Management	Does not agree with Table 3.2. Including these figures goes beyond what is required by SPP and SDP Policy 5. It could be concluded that Table 3.2 is deleted although it does have value in providing guidance on the location of future allocations. However there is concern that these Additional Allowances are misinterpreted as housing land shortfalls. There is a risk that each LDP could interpret the Additional Allowances as the maximum land to be allocated. Recommend the addition of three SDAs - North West Edinburgh (1,000 homes), South West Edinburgh (1,500 homes) and the Fife Bridgehead. The latter would include towns such as Limekilns, Rosyth, North Queensferry, Inverkeithing and Dalgety Bay and have an allocation of 2,170 homes. The 2,170 would be made up of 950 deducted from the Outwith SDA Allowance and 1,220 deducted from the Ore / Upper Leven Valley SDA. Supporting document including proposed modifications submitted.
531	Murray Estates C/o Holder Planning	Does not agree with Table 3.2 since it contains information that goes beyond SDP Policy 5 or what is required of an SDP. It is for LDPs to demonstrate how the housing land requirement should be met. The identification of 'Additional Allowances' both within and outwith the Strategic Development Areas is both premature and inappropriate. 13% of SESplan's total housing land requirement and 16% of the established housing land supply is proposed to be provided for by constrained sites. This approach is entirely unsubstantiated and presents a very significant risk to achieving a generous land supply. Counting windfall sites is in direct contradiction of PAN 2/2010. Table 3.2 should be deleted.
534	Hallam Land Management	Does not agree with Table 3.2. Including these figures goes beyond what is required by SPP and SDP Policy 5. It could be concluded that Table 3.2 is deleted although it does have value in providing guidance on the location of future allocations. However there is concern that these Additional Allowances are misinterpreted as housing land shortfalls. There is a risk that each LDP could interpret the Additional Allowances as the maximum land to be allocated. Recommend the addition of three SDAs - North West Edinburgh (1,000 homes), South West Edinburgh (1,500 homes) and the Fife Bridgehead. The latter would include towns such as Limekilns, Rosyth, North Queensferry, Inverkeithing and Dalgety Bay and have an allocation of 2,170 homes. The 2,170 would be made up of 950 deducted from the Outwith SDA Allowance and 1,220 deducted from the Ore / Upper Leven Valley SDA. Supporting document including proposed modifications submitted.

Response ID	Respondee	Summary
542	Taylor Wimpey C/o Holder Planning	Does not agree with Table 3.2 since it contains information that goes beyond SDP Policy 5 or what is required of an SDP. It is for LDPs to demonstrate how the housing land requirement should be met. The identification of 'Additional Allowances' both within and outwith the Strategic Development Areas is both premature and inappropriate. 13% of SESplan's total housing land requirement and 16% of the established housing land supply is proposed to be provided for by constrained sites. This approach is entirely unsubstantiated and presents a very significant risk to achieving a generous land supply. Counting windfall sites is in direct contradiction of PAN 2/2010. Table 3.2 should be deleted.
553	Ashfield Commercial Properties Ltd	The greatest challenge lies at the local level where sites for these additional allowances must be found. Concur with the view that those authorities best placed, strategically to deliver additional housing, take a proportion of the City's need and demand in addition to meeting their own housing need and demand, such as East Lothian. As no significant brownfield sites have been identified, greenfield sites have to be included. Goshen Farm is located within the East Lothian SDA and can accommodate up to 1,200 units. The site can come forward now in order to help East Lothian Council maintain a five years' effective housing land supply.
559	Mr Nick Lansdell	Does not agree with Table 3.2. The numbers will put pressure on green field sites within West Lothian. There should be a presumption against large scale development which impacts adversely upon communities and support for small scale affordable development. The numbers should be reduced and there should be a presumption against large development against community wishes. Economic sites should be protected.
567	Morrison	Does not agree with Table 3.2. Object to the inclusion of Green Belt land. Brownfield sites should be prioritised along with additional development opportunities along the tram corridor. No justification has been given for Cammo being included in West Edinburgh.
572	Scottish Property Federation (Mr David Melhuish)	Does not agree with Table 3.2. The Additional Allowances in West Edinburgh and A7 / A68 / Borders Rail Corridor could be increased and may need to be in order to make up for the expectation that the waterfront will not deliver as expected by Edinburgh.
574	Mrs Christine Briffitt	Does not agree with Table 3.2. The allocation of numbers is disproportionately high for Fife. Fife has seen a huge amount of development in the last 10 years. The infrastructure is not in place particularly Outwith SDAs. The allocation of houses in small coastal villages and other areas of special interest should be avoided at all costs.
578	Mr Archibald Clark	Any encroachment into Green Belt / undeveloped land must be avoided until land for future agricultural production can be protected. Densities should be increased and the Scottish Government must provide incentives.
589	Cadzow Estate	Does not agree with Table 3.2. Do not agree that West Lothian is in any way self-contained. Concerned that the provision of sufficient housing to supply the 'cross Plan' requirement created by the Gyle / Airport / Newbridge / Livingston employment corridor has not been adequately addressed.



Response ID	Respondee	Summary
<b>Question 4 - Do you agree with the additional allowances outwith Strategic Development Areas as shown in Table 3.2 of the Supplementary Guidance? Do you have any further comments on the additional allowances outwith Strategic Development Areas set out in Table 3.2 of the Supplementary Guidance?</b>		
15	Alfred Stewart Properties Ltd	<p>Paragraph 3.10 - The SDP should be locationally specific as where such allocations outwith SDAs should be made. The figures in Table 3.2 are too low. 'Additional Allowances' should be renamed 'Additional Requirement' to comply with the SDP and SPP.</p> <p>Paragraph 3.13 - The Member Authorities should not use housing completion rates as a means of avoiding allocations responsibilities. If sufficient land is allocated in the right places, development rates will increase. Section 4 of the Technical Note clearly demonstrates that the surrounding areas to Edinburgh are a major attraction to house buyers leaving the City. This is due to a lack of affordable family housing within the City. Table 4.1 of the Technical Note is misleading. The Table tries to compare average completion rates from 2004 - 2012 against a requirement that starts in 2009. Replacement figures for Table 4.1 submitted. The replacement figures demonstrate additional land / planning consents must come forward on land that is deliverable in the short term to increase annual completion rates. The increase in the additional allowance outwith SDAs in Fife is welcomed. Further detail is required in support of Table 6.2 of the Technical Note. There would appear to be no detailed technical analysis of need and demand as it relates to accessibility or weighting given to any of the factors considered. Paragraph 6.5 of the Technical Note refers to SDP2. If this information is available it should be applied to SDP1 through this Supplementary Guidance. The Guidance and Technical Note appear to be ignoring the reality of the housing market in the SESplan area.</p>
21	Regenco (Trading) Ltd	<p>Paragraph 3.10 - There is no mechanism within the SDP that allows the separation of within and outwith SDAs. SDP Policy 7 allows for land to come forward outwith SDAs only to maintain a five year housing land supply. Concern has previously been raised that West Lothian is a stand alone SDA. The Winchburgh secondary school will be delivered in 2017 / 2018, as such Winchburgh is an inherently deliverable location for new residential development. The figures in Table 3.2 are too low. 'Additional Allowances' should be renamed 'Additional Requirement' to comply with the SDP and SPP. Paragraph 3.13 - The Member Authorities should not use housing completion rates as a means of avoiding allocations responsibilities. If sufficient land is allocated in the right places, development rates will increase. Section 4 of the Technical Note clearly demonstrates that the surrounding areas to Edinburgh are a major attraction to house buyers leaving the City. This is due to a lack of affordable family housing within the City. Table 4.1 of the Technical Note is misleading. The Table tries to compare average completion rates from 2004 - 2012 against a requirement that starts in 2009. Replacement figures for Table 4.1 submitted. The replacement figures demonstrate additional land / planning consents must come forward on land that is deliverable in the short term to increase annual completion rates. The increase in the additional allowance outwith SDAs in Fife is welcomed. Further detail is required in support of Table 6.2 of the Technical Note. There would appear to be no detailed technical analysis of need and demand as it relates to accessibility or weighting given to any of the factors considered. Paragraph 6.5 of the Technical Note refers to SDP2. If this information is available it should be applied to SDP1 through this Supplementary Guidance. The Guidance and Technical Note appear to be ignoring the reality of the housing market in the SESplan area. Paragraph 5.39 of the Technical Note notes that there remain issues of infrastructure and environmental constraints along the M9 Corridor (Area 6) in settlements including Linlithgow, Livingston and Winchburgh. Infrastructure is being implemented in phases. West Lothian is capable of accommodating further strategic growth beyond that which the Supplementary Guidance suggests.</p>
29	Liberton and District Community Council (Mr Jim Henry)	<p>If paragraph 3.10 is not amended, it could result in the allocation of land for up to 2,500 houses split between West Edinburgh and South East Edinburgh, the proposal in Table 3.2 is not the preferred option of Liberton and District Community Council. The Council considers that to accommodate the 2,500 houses outwith the existing SDAs SESplan should identify another SDA to facilitate meeting this land requirement. An alternative would be to require that the allocation be met from sites dispersed throughout City of Edinburgh Council area and directed by means of a hierarchy of development starting firstly with brownfield land, then to non-prime agricultural land, then land outwith the Green Belt.</p>

Response ID	Respondee	Summary
45	Scottish Natural Heritage (Ms Vivienne Gray)	Agree with Table 3.2. No further comment.
53	Dr Tom Slater	Does not agree with Table 3.2. Empty homes should be made available.
67	Gladman Developments (Simon Dean)	Agree with Table 3.2. Would wish to see that the wording, particularly in paragraph 3.10 remains as shown in the draft. Currently, the 'outwith-SDA' requirements set out in table 3.2 are referred to as 'suggestions' and the levels are described as 'indications'. This approach is consistent with the flexibility requirements of SESplan (specifically policies 6 and 7), SPP and draft SPP. The wording in paragraph 3.11 reinforces this and should not be diluted.
80	SEPA (Mr Paul Lewis)	SEPA cannot answer these questions confidently until an SFRA is completed and the distribution of housing land identified in Table 3.1 tested against it. Flooding and water management is of concern.
86	Musselburgh Conservation Society (Mr Barry Turner)	Agree with the Outwith SDA's section of Table 3.2.
102	Mr Grant McCulloch	Does not agree with the Outwith SDA allowances. The extra should be proportionate across the whole SESplan area, and not restricted to these 3 areas.
115	Murieston Community Council (Mr Davidson McQuarrie)	Does not agree with the Outwith SDA allowances. These allowances should be better defined as the SDAs.
133	Banks Group (Mr Alistair Landells)	Agrees with Table 3.2.
138	Cruden homes / Land Options East	Have no disagreement in principle to the additional allowances which have been identified outwith the SDAs but question the wisdom of confining such allowances to the City of Edinburgh, Fife and the Scottish Borders Council Areas. There are many small sites throughout the SESplan area which are capable of contributing towards the strategic housing land supply and would help to maintain the required five year supply of effective housing land. Major strategic sites are slow to deliver and need to be supplemented by smaller and more immediately deliverable sites such as those at Gullane. Such sites would also ensure a greater choice and range of house building opportunities across the area. It is suggested that additional allowances be identified outwith SDAs for not only East Lothian but also Midlothian and West Lothian.
141	Mr Alan Harrison	Does not agree with the Outwith SDA Allowances in Table 3.2. See Response 140.
147	Dr Simon Jackson	Does not agree with the Outwith SDA Allowances in Table 3.2. See Response 145.
167	Mactaggart & Mickel (Homes) Ltd (Mr Ken Hopkins)	Agree with Outwith SDA Allowances in Table 3.2, but consider they are not enough. Supporting document submitted. There is no evidence to back up the assumptions made on windfall and constrained supply. Increasing densities as a mathematical exercise is simplistic.
173	Scottish Government (Mrs Roseanne Leven)	Agree with Table 3.2. Content, subject to your responses to questions 5 and 6 (Responses 174 and 175)

Response ID	Respondee	Summary
180	Mansell Homes	<p>Does not agree with Table 3.2. The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit is allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs There are many smaller settlements in accessible parts of Fife with capacity.</p>
186	TMS Planning Services	<p>The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit is allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs There are many smaller settlements in accessible parts of Fife with capacity.</p>

Response ID	Respondee	Summary
192	Campion Homes	Does not agree with Table 3.2. The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit in allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs. There are many smaller settlements in accessible parts of Fife with capacity.
198	Muir Homes	Does not agree with Table 3.2. The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit in allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs. There are many smaller settlements in accessible parts of Fife with capacity.
211	Aithrie Estates	Does not agree with Table 3.2. The inclusion of an additional 2,500 homes in Edinburgh is inappropriate. It will lead to further pressure to develop on present Green Belt. There is no Green Belt in West Lothian.
218	Strawson Property	Agree with the Outwith SDA's section of Table 3.2.
226	Grange and Prestonfield Community Council (Mr Tony Harris)	Agree with Table 3.2. See also the response to Question 7 for further comment (Response 223).
236	The Cockburn Association (Ms Marion Williams)	Does not agree with Table 3.2. City of Edinburgh Outwith SDA - SSAs 9 and 11 - An additional 2500 units. How is this to be achieved without serious damage to the environment. Development in these locations is a departure from the concept of the SDP as approved by Ministers which sees the thirteen SDAs as the "primary locations for growth and development". There will be unacceptable implications for the Green Belt.
245	Kalewater Community Council	Agree with Table 3.2.

Response ID	Respondee	Summary
255	Haddington and District Amenity Society (HADAS) (Chairperson)	Nothing to add. See Response 253.
263	Barratt and David Wilson Homes	Does not agree with Table 3.2. Whilst a significant improvement, the allowances for Edinburgh should be increased further in terms of North-West/South-West as more marketable (and hence deliverable) locations than part of Fife's additional provision. Planned expansion of Rural West settlements aligned to improved bus service connections to rail and tram links should be embraced given proximity to employment / services in West Edinburgh. Supporting document submitted.
266	Historic Scotland	Historic Scotland has no specific comments to make in relation to the actual breakdown and distribution of the additional allowances within or outwith the SDA's. Would note that the allocation of additional housing land within the SESplan area increases the potential for impacts on the historic environment which will require to be reviewed during the site allocation process by the relevant Local Authorities in the preparation of their LDP's.
276	Dr David Malton	Does not agree with Table 3.2. Fife has been disproportionately targeted. Small villages will be negatively economically impacted by development. Aberdour relies on it's beauty to attract visitors, not traffic and sprawling developments.
284	Mr Thomson	Does not agree with Table 3.2. There is a greater need to create employment opportunities outwith Edinburgh. See Responses 283, 285 and 286.
296	Balerno Community Council (Mr Richard Henderson)	Does not agree with Table 3.2. Development outwith SDAs by definition cannot be strategic. If such development is deemed necessary then it must be sustainable. The criteria for assessing suitability for further development clearly show South West Edinburgh to be unsuitable. Balerno and Currie have access to only one train station which is currently restricted. The A70 which runs through the villages is at capacity.
305	Trustees of the Foxhall Trust (Mr Peter Carus)	Does not agree with Table 3.2. Welcomes the additional allowances outwith SDAs but understand the figures are based on Seaplane's appraisal of how much additional land can be accommodated within the SDAs. As noted in responding to Question 3 (Response 304), allocated sites within SDAs may well be constrained and their delivery stalled accordingly. Caution is required in terms of potential over-reliance on allocated sites that might not achieve delivery of new housing targets.
310	EDI Brunstane Final	Does not agree with the Outwith SDA Allowances within Table 3.2. The strategy to depart from established SDAs is not sufficiently justified. Suggest that the Outwith SDA figures should be re-appraised, with a closer examination of the SDA first principle. Maximising the capacity of the SDAs will enable demand to be met closer to where it is generated, reduce travel and better relate housing to employment opportunities.
317	Straiton Parks Ltd (Mr Rob Snowling)	Does not agree with the proposed additional allowances outwith Strategic Development Areas. Any additional allowances should be directed to the SDAs (in particular the A701 corridor) before being distributed to Local Development Plan areas outwith the SDAs.
341	Mrs Carolyn Craig	Does not agree with Table 3.2.
346	Mrs Gertrud Mallon	Does not agree with Table 3.2. The allocation for the rest of Fife (outwith SDAs) is far too big given the state of the transport network, the environmental issues (especially the impact on Landscape/Townscape, cultural heritage etc.
353	Mrs Anna Purdie	Does not agree with Table 3.2. Fife has been given a disproportionate amount of the new proposed house allocation for its landscape. The cultural heritage that the area has to offer will be lost. The transport networks will also not be able to cope with the influx of housing in the area.
359	Mr Alan Pithie	Does not agree with Table 3.2. There is clear evidence that the existing road systems within Edinburgh cannot cope with the present populations' needs. There is also a lack of facilities for these communities. No further housing allowances should be granted on the West side of Edinburgh. It would be wrong to allocate land within Cammo when are no plans to balance that removal of land with any improvement to roads and facilities.
362	Mr Kenneth Murray	Does not agree with Table 3.2. The consequences of giving into development pressure outwith SDAs will be very significant for the character of Fife villages and tourist / visitor businesses.

Response ID	Respondee	Summary
366	Ogilvie Homes	Does not agree with Table 3.2 since it seeks to place a limitation on the amount of housing land that can come forward on sites, which lie outwith the identified SDAs. In view of SDP Policy 7 there is no policy basis upon which to justify any restriction in the amount of land that can potentially come forward on sites falling outwith an SDA. The wording of paragraph 3.9 must be changed to conform with Policy 7. Fife is considered to be the least well placed to accept further growth over and above that which relates to the SDAs. The allocation set against Fife should be deleted from Table 3.2, with the allocation of 1,950 units being reallocated to more appropriate locations.
372	Ashdale Land and Property	Does not agree with Table 3.2 since it seeks to place a limitation on the amount of housing land that can come forward on sites, which lie outwith the identified SDAs. In view of SDP Policy 7 there is no policy basis upon which to justify any restriction in the amount of land that can potentially come forward on sites falling outwith an SDA. The wording of paragraph 3.9 must be changed to conform with Policy 7. Fife is considered to be the least well placed to accept further growth over and above that which relates to the SDAs. The allocation set against Fife should be deleted from Table 3.2, with the allocation of 1,950 units being reallocated to more appropriate locations.
389	Mr Patrick Mitchell	Does not agree with Table 3.2. Development is disproportionately concentrated on two areas in Edinburgh. The numbers at West Edinburgh require greenbelt land for nearly all of the housing units required.
392	Mr Michael Fenner	Does not agree with Table 3.2. The Fife outwith SDAs allowance is disproportionately high in relation to its current population, expected demand levels and availability of suitable sites. Would suggest that allowances outwith SDAs should not be included at this time. Further suitable brownfield sites within already designated SDAs will become available to any augment any shortfall if required.
395	Mrs Caitlin Hamlett	Does not agree with Table 3.2. The proposed additional allowances have already led to an unprecedented rate of speculative planning applications in highly unsustainable locations. Paragraph 5.20 of the Technical Guidance states that South West Edinburgh (Ratho, Juniper Green, Currie, Balerno and Hermiston) has the potential to accommodate development on a strategic scale. However the criteria for assessing suitability show the area to be unsuitable.
405	Mr John Watkins	Does not agree with Table 3.2. No space available for any more development without using parks and greenbelt.
416	Juniper Green Community Council (Mr Neil Ingram)	Does not agree with the Outwith SDA Allowances within Table 3.2. The areas which would need to be developed are located away from sites which have the best infrastructure. Even developments of 100 houses would put considerable strain on existing transport links, local schools and other amenities. The best possible use should be made of brownfield sites, and any development elsewhere needs to be properly planned with adequate road and public transport provision.
424	Mr James Poseley	Does not agree with Table 3.2. There is no strong link to future employment possibilities. Surely it makes more sense to increase regional centres and areas outside of cities to support the growth of Scotland.
431	HPG Dalkeith Ltd	Does not agree with Table 3.2. It is not evident how the refresh has weighted economic and other benefits of delivery against environmental impact or how this is reflected in the distribution of additional allocations. The refresh has significant serious deficiencies and is purely qualitative, subjective and value laden. Densifying existing allocations cannot be assumed to be automatically the case. It is not evident how the principles for identifying allocations within and outwith SDAs have been undertaken.
432	Mrs Susan Warwick	Does not agree with Table 3.1. The allocation for housing units for West Edinburgh is not feasible. The road systems are at capacity.
459	Firrhill Community Council (Mr James Napier)	Does not agree with Table 3.2. Brownfield sites should be developed first and then, if necessary, consideration be given to releasing more greenfield land for housing development, within the parameters set out in the approved Edinburgh LDP.
471	Miller Homes East Scotland Ltd	Does not agree with Table 3.2. Agrees with the identification of 1,950 additional units provided that the figure is justified in terms of the HNDA. However, it will be important that these units are allocated in the right place and on sites that are effective and therefore deliverable.

Response ID	Respondee	Summary
473	Mrs Blythe Peart	Does not agree with Table 3.2. Scottish Borders allowance could be increased due to new purpose built rail link in the Borders Rail Corridor.
484	Strutt and Parker (Mr John Wright)	Agree with the Outwith SDA Allowances within Table 3.2, although the heading is misleading implying that these figures are in addition. Supportive of the identification of a requirement for delivery outwith SDAs as this will introduce a range and choice of location for housing but remain concerned about the displacement of housing away from the City.
490	Dr Caroline Richie	Does not agree with Table 3.2. Concerned that the allocation of further land for housing development in rural South West Edinburgh will result in development in unsustainable locations resulting in increased car use. This will result in further congestion on roads that are at capacity.
491	Dr Caroline Richie	Duplicate response. See Response 490.
498	Persimmon Homes East Scotland (Mr Gordon Johnson)	Does not agree with Table 3.2. The numbers are not clearly justified. On what basis has the reprogramming of brownfield land in Edinburgh taken place? There is no evidence to state how the constrained supply has been calculated. If aiming to deliver a generous supply the housing land requirement should be higher by up to 20%.
503	Miss Sally McKenzie	Does not agree with Table 3.2. It is inconceivable that Fife has been allocated an additional allowance of 1,950 and the Scottish Borders only 80. No explanation has been given for this. Fife should receive less of the allocation considering its size compared to the Scottish Borders.
508	Stewart Milne Homes C/o Holder Planning	Does not agree with Table 3.2. This approach is potentially-misleading. The SDP should simply set out the housing requirement to be met. The task of demonstrating how the requirements can be met should fall to the LDP. The Guidance makes unsubstantiated assertions about constrained sites and potential windfall contributions. Paragraph 3.9 does not accord with SDP Policy 7 as amended by Ministers.
516	Aberdour Community Council	Does not agree with Table 3.2. The figure for Fife is disproportionate. Only City of Edinburgh, Fife and Borders are included in this category – why? 80 for the whole of the Borders region is hardly worth mentioning.
523	Wallace Land Investment & Management	Does not agree with Table 3.2. Including these figures goes beyond what is required by SPP and SDP Policy 5. It could be concluded that Table 3.2 is deleted although it does have value in providing guidance on the location of future allocations. However there is concern that these Additional Allowances are misinterpreted as housing land shortfalls. There is a risk that each LDP could interpret the Additional Allowances as the maximum land to be allocated. Recommend the addition of three SDAs - North West Edinburgh (1,000 homes), South West Edinburgh (1,500 homes) and the Fife Bridgehead. The latter would include towns such as Limekilns, Rosyth, North Queensferry, Inverkeithing and Dalgety Bay and have an allocation of 2,170 homes. The 2,170 would be made up of 950 deducted from the Outwith SDA Allowance and 1,220 deducted from the Ore / Upper Leven Valley SDA. Supporting document including proposed modifications submitted.
532	Murray Estates C/o Holder Planning	Does not agree with Table 3.2 since it contains information that goes beyond SDP Policy 5 or what is required of an SDP. It is for LDPs to demonstrate how the housing land requirement should be met. The identification of 'Additional Allowances' both within and outwith the Strategic Development Areas is both premature and inappropriate. 13% of SESplan's total housing land requirement and 16% of the established housing land supply is proposed to be provided for by constrained sites. This approach is entirely unsubstantiated and presents a very significant risk to achieving a generous land supply. Counting windfall sites is in direct contradiction of PAN 2/2010. Table 3.2 should be deleted.

Response ID	Respondee	Summary
536	Hallam Land Management	Does not agree with Table 3.2. Including these figures goes beyond what is required by SPP and SDP Policy 5. It could be concluded that Table 3.2 is deleted although it does have value in providing guidance on the location of future allocations. However there is concern that these Additional Allowances are misinterpreted as housing land shortfalls. There is a risk that each LDP could interpret the Additional Allowances as the maximum land to be allocated. Recommend the addition of three SDAs - North West Edinburgh (1,000 homes), South West Edinburgh (1,500 homes) and the Fife Bridgehead. The latter would include towns such as Limekilns, Rosyth, North Queensferry, Inverkeithing and Dalgety Bay and have an allocation of 2,170 homes. The 2,170 would be made up of 950 deducted from the Outwith SDA Allowance and 1,220 deducted from the Ore / Upper Leven Valley SDA. Supporting document including proposed modifications submitted.
543	Taylor Wimpey C/o Holder Planning	Does not agree with Table 3.2 since it contains information that goes beyond SDP Policy 5 or what is required of an SDP. It is for LDPs to demonstrate how the housing land requirement should be met. The identification of 'Additional Allowances' both within and outwith the Strategic Development Areas is both premature and inappropriate. 13% of SESplan's total housing land requirement and 16% of the established housing land supply is proposed to be provided for by constrained sites. This approach is entirely unsubstantiated and presents a very significant risk to achieving a generous land supply. Counting windfall sites is in direct contradiction of PAN 2/2010. Table 3.2 should be deleted.
549	Scottish Property Federation (Mr David Melhuish)	Agree with Table 3.2 and the direction of travel but would argue that further allowances should be identified across the region in order to compensate for shortfalls in anticipated delivery elsewhere (as is consistent with SPP).
554	Ashfield Commercial Properties Ltd	No Response.
560	Mr Nick Lansdell	Does not agree with Table 3.2. Developers are interested in developing premium housing in what is seen as highly marketable areas. This leaves other areas, who might otherwise benefit economically, undeveloped. It also creates pressure hotspots on infrastructure and diminishes quality of life in those areas.
568	Morrison	Does not agree with Table 3.2. Additional space should and must be found to avoid building on Green Belt Land in the SDAs particularly West Edinburgh and the Green Belt in Cammo. There must be more effort made to absorb, create and include development sites within the City.
575	Mrs Christine Briffitt	Does not agree with Table 3.2. The allocation for Fife Outwith SDAs is far too big given the state of the transport network and the environmental issues. Assessment of the traffic situation was a desk exercise. Amenities in the Aberdour part of Fife will not support an increase of housing as they are already stretched and poorly funded. Allocation of building land within Fife on Areas of Special Landscape Value will have a negative impact on the whole region.
579	Mr Archibald Clark	Does not agree with Table 3.2. A generous amount of land has already been identified under the Edinburgh LDP. Because developers dictate what are 'effective' sites, we are seeing a haphazard sprawl of housing that means that travel distances become extended in order to go to work, to shop, or to participate in leisure activities. Attention should be focused on developing existing brownfield land.
590	Cadzow Estate	Does not agree with Table 3.2. The proposed allocation of additional allowances appears to be contrary to established planning policy in that it has allocated in excess of 20% of the sites outwith SDAs. In addition to this West Lothian is allocated fewer allowances than West Edinburgh, Fife and East Lothian.
<b>Question 5 - Is the distribution of the housing land requirement including additional allowances, over the period to 2024, shown in Tables 3.1 and 3.2 of the Supplementary Guidance, deliverable? Please set out any comments.</b>		
16	Alfred Stewart Properties	Not deliverable. Should not expect constrained land to be fully delivered in plan period. Actual existing supply of housing land is smaller that set out in Technical Note. Housing Land Audit figures are flawed. No demand for flatted development at Edinburgh Waterfront and it is not a marketable location. Concern also over delivery of Blindwells and East Broxburn.
22	Regenco	Not deliverable. Should not expect constrained land to be fully delivered in plan period. Actual existing supply of housing land is smaller that set out in Technical Note. Housing Land Audit figures are flawed. No demand for flatted development at Edinburgh Waterfront and it is not a marketable location. Concern also over delivery of Blindwells and East Broxburn.



Response ID	Respondee	Summary
30	Liberton CC	Yes deliverable but insufficient road capacity to support housing in South East Edinburgh SDA.
34	Craigshill CC	Yes deliverable
37	Milesmark and Baldrige CC	Not deliverable due to lack of school and road investment in Dunfermline area.
46	SNH	Yes deliverable
54	Dr Tom Slater	Not deliverable in current economic environment.
60	Mr Scott Mackenzie	Yes deliverable and will create employment.
68	Gladman	Yes deliverable subject to reassessment of land supply and LDP preparation as required by SG.
77	SEPA	Flood risk should be addressed at the early stages of plan preparation.
87	Musselburgh Conservation Society	The requirement is not deliverable as developers are not deliver existing sites. In East Lothian there are infrastructure capacity issues and environmental constraints that will restrict development.
99	Cllr Dave Dempsey	No. Housing will be delivered if housebuilders see it in their best interests to deliver it. That will depend on economic factors, political decisions and a whole host of other things that no-one has foreseen.
106	Mr Grant McCulloch	Required development rates to meet requirement are not attainable. This is evidences by the number of sites currently not being developed.
116	Murieston Community Council	No. Infrastructure should be in place before any significant development
120	Mrs Sally Chambers	Current rates show that it is undeliverable.
125	Miss Carolyn Campbell	No. Question the need for further sites, such as Cammo, given the number of uncompleted sites across the city.
134	Banks Group	Given the level of investment required is clearly beyond the local authorities there would seem to be a need for a much greater level of investment from Scottish Government funding sources to allow for the provision of such essential infrastructure to be considerably greater than is the case at present. Priority should be given to within existing built up areas when allocating new sites for development
148	Dr Simon Jackson	No. West Edinburgh transport and education infrastructure cannot accommodate new development.
166	McTaggart & Mickel Homes	Yes but the additional allowances are not in the correct areas.
174	Scottish Government	Without a clear understanding of the phasing of development and infrastructure provision, the impact on the deliverability of development that may require additional infrastructure is unclear. The failure of the process so far to provide a resolution that is supported by all stakeholders and delivers a clear mechanism, or mechanisms, for addressing cross boundary transport issues and funding contributions, and a suite of interventions shown to be deliverable, at least in part by such mechanisms, means that the deliverability of the infrastructure that might be necessary to support the overall spatial strategy is questionable.
181	Mansell Homes	No due to the use of non-effective allocations. Housing development should be directed to marketable locations where people want to live.
187	TMS Planning Services	No. Compounding a failing strategy with additional non-effective allocations is a self-fulfilling prophesy of failure. The SG needs to breathe new life into the delivery process by directing development to marketable locations, to places people want to live.
193	Campion Homes	No. Compounding a failing strategy with additional non-effective allocations is a self-fulfilling prophesy of failure. The SG needs to breathe new life into the delivery process by directing development to marketable locations, to places people want to live.

Response ID	Respondee	Summary
199	Muir Homes	No. Compounding a failing strategy with additional non-effective allocations is a self-fulfilling prophesy of failure. The SG needs to breathe new life into the delivery process by directing development to marketable locations, to places people want to live.
202	Mr Peter Scott	Not deliverable. 2,500 houses at West Edinburgh are not deliverable due to transport infrastructure and education capacity constraints. The proposed solution to deal with these issues to accommodate growth will not be effective.
212	Airthrie Estates	Not deliverable. Plan making delays have led to a shortfall in delivery. Overspill from Edinburgh into Mid and East Lothian may be undeliverable. Winchburgh can accommodate and deliver further development.
219	Strawson Property	The distribution shown in Tables 3.1 and 3.2 is not deliverable over the period to 2024
225	Grange and Prestonfield Community Council	Unknown. Will required significantly higher delivery rates. Delivery of the requirements may have an unacceptable impact on the LDP.
237	Cockburn Association	Questions the delivery of land allocations because of: previous records of under achievement; uncertainty about whether HNDA is reliable; and considerable concern that a reasonable balance between housing land requirements and other important factors cannot be achieved. Currently delivery rates are significantly below those required. Required to monitor trends to ensure that environmental and landscape-sensitive areas are not prematurely or unnecessarily released for housing development.
246	Kalewater Community Council	Yes deliverable.
256	Haddington and District Amenity Society	Decisions made at appeal could have a considerable impact on specific towns and villages
264	Barratt and David Wilson Homes	Housing sites emerging through adopted LDP's will have just 3 years within which to contribute to the first demand period to 2019. Clearly, this will not deliver the pre-2019 housing numbers. The provision of new schools should be explicitly linked to housing programming to ensure that developers are not asked that new schools be in place on day one but instead, when housing programming indicates they will actually be required. New housing sites should be released now or allow housing requirements to be met.
270	Savills	No. There is an over reliance on many strategic sites which require significant infrastructure to be delivered.
271	Savills	Ensure that the principle of allowing housing development on sustainable locations is put into the document to allow additional sites to come forward over the plan period.
275	Mr Martin Bailey	The process of appeals, enquiries, etc seems not to have been taken into account. Delivery of land is only the beginning of the building process.
283	Mr Thomson	Yes if there is the will and finance to provide the infrastructure. It is not realistic to expect the developer and then the house buyer to bear the brunt of these costs.
292	Mr Jon Grounsell	The problem is not house building or land, but finance and credit.
297	Balerno Community Council	The required rate of delivery is not realistic in Edinburgh. The consequence will be half finished building sites as developers start development in order to comply with planning permissions, while delaying completions to maximise sale price.
311	EDI Brunstane	Not deliverable. The SG is drafted on the basis that a very significant increase in housing completion rates suddenly occurs, almost immediately. We question the realism of this premise, and advocate that a more pragmatic approach towards essential infrastructure improvements is needed to support the required transformation in completion rates. It is the house building industry's perception that it takes much longer to achieve planning permissions in Scotland than elsewhere in the UK, and the fact those consents are typically burdened to a greater level.
318	Straiton Parks Ltd.	The additional allowances within the A701 corridor are deliverable.
328	Mrs Ruth Schofield	Green Belt must be protected and alternative sites identified. Accessibility should be a key consideration.

Response ID	Respondee	Summary
367	Ogilvie Homes	Not deliverable. The Guidance should, on the issue of Delivery, restrict itself to considerations of meeting the assessed need and demand only. Housing should be allocated in areas where there is a demand for new housing.
373	Ashdale Land & Property	Not deliverable. The Guidance should, on the issue of Delivery, restrict itself to considerations of meeting the assessed need and demand only. Housing should be allocated in areas where there is a demand for new housing.
380	Mrs Elaine Hutchison	Proposed housing completion rates have not been delivered for 20 years and are unachievable. Proposed approach could lead to half completed sites. Housing completions is only one of 50 indicators towards national objectives. Other relevant indicators are Increase the proportion of journeys to work made by public or active transport; reduce traffic congestion; and reducing Scotland's carbon footprint. Pursuing the housing indicator may prevent the achievement of others. Making housing land available should consider: the required supply of enabling infrastructure- water, sewerage and roads; the recent recession and wider economy; and housing market conditions. This Measure also takes into account of conversions of existing buildings to housing use or refurbishment of dwellings. These opportunities must be explored before considering greenbelt and/or agricultural land.
385	Mr Patrick Mitchell	Not deliverable. There is sufficient housing units granted permission for 9 years supply without providing additional land (on historic average completion levels). Level of delivery required is undeliverable. The additional allowances will encourage speculative applications around the greenbelt to fulfil this requirement, without consideration to existing infrastructure, future requirements and impact of existing residents.
398	Mrs Caitlin Hamlitt	Not deliverable. The required delivery rates are unachievable. Attempting to meet the proposed high build rates will compromise the region's ability to meet these other key National Outcomes, while achieving deliverability will necessitate house building in unsustainable locations contrary to national policy.
406	Mr Jon Watkins	Not necessary and no space in Edinburgh
409	Burnside	Not deliverable due to significant backlog. Delivering required new schools and transport infrastructure will be difficult in financial climate.
417	Juniper Green Community Council	Note deliverable. Would require development on a scale that the building industry is unlikely to be able to support.
428	Mr James Poseley	Not deliverable due to the rates required before 2015 and the infrastructure required to support development. In particular, school extensions and new schools to provide the additional pupil places required to meet development need are seen as essential and must be delivered. Infrastructure and services in Cammo are already at capacity and the proposed transport and education solutions are not sufficient.
433	HPG Dalkeith	In general terms it is considered that effectiveness and delivery have not been taken into account as part of a strategy for recovery and sustainable economic growth. Too much non effective and constrained land is identified based on historic allocations with high servicing and infrastructure costs. This will erode land values and slow the pace of development. It is already clear that interim arrangements will need to be put into place to allow the housing market to operate in advance of LDPs being adopted. It is the HPG Dalkeith view that the targets for Shawfair will be facilitated by an additional release at Cauldcoats. Furthermore the deliverability in this and other SDAs is reliant on paying for infrastructure contributions and this is unlikely to happen without greater critical mass and further investment.
444	Cramond & Barnton Community Council	2,700 dwellings at West Edinburgh is not deliverable. The proposed infrastructure improvements will not achieve a 'no net detriment' situation. The development could not financially generate sufficient funds to developed the level of infrastructure required to accommodate the development.
460	Firrhill Community Council	No evidence to show that the delivery of housing on such a scale would be achieved within those timescales.
465	Banks Group	Questions deliverability of housing requirements in Edinburgh, Fife and East Lothian.
472	Miller Homes East Scotland	Allocating sites in the interim will not prejudice developing the remainder of SDAs.
475	Mrs Blyth Peart	Yes, subject to the development at Blindwells progressing.

Response ID	Respondee	Summary
485	Strutt & Parker	No. The SG does not direct enough requirements to marketable and deliverable locations. There has been an over reliance in constrained and non-effective sites. Use of a windfall allowance is contrary to Government guidance.
494	Dr Caroline Ritchie	Development is taking place too rapidly that it does not allow for reflection on the impacts. Affordable housing requirements are not being met due to a lack of finances. Another crash would lead to uncompleted sites around the country and many repossessions.
499	Persimmon Homes East Scotland	Depends on whether effective sites are allocated in LDPs and whether the supply is generous. The requirements for Scottish Borders will not be met due to a lack of market demand. Edinburgh should meet more demand. Housing targets should be set high when coming out of a recession. Plan delays should not restrain housing numbers.
510	Stewart Milne Homes	Not deliverable. The SDP should plan for 20 years and not focus on recent delivery rates. Edinburgh's commuting patterns are unsustainable. The SPDA should seek to meet housing need where it arises to prevent exacerbation of this. The distribution of the housing requirement is not in line with market evidence , particularly in Fife and Scottish Borders. This will lead to non delivery.
518	Aberdour Community Council	No comment
524	Wallace Land Investment & Management	Confidence in the effectiveness of the future land supply is an LDP matter and should be left to each LDP to resolve, dealing with its established land supply and assessing in detail the specific sites which can be delivered over its plan period in association with the house building sector and Homes for Scotland.
533	Murray Estates	Have significant reservations as to the deliverability of the housing land requirement over the period to 2024. These are based upon the SG's failure to adequately reflect patterns of demand and housing market trends when distributing the housing land requirement and the significant and inappropriate over-reliance on constrained and windfall sites within the established housing land supply. The Scottish Borders is an example of both by having a housing requirement that is significantly in excess of need there and including constrained sites to meet this.
537	Hallam Land Management	Confidence in the effectiveness of the future land supply is an LDP matter and should be left to each LDP to resolve, dealing with its established land supply and assessing in detail the specific sites which can be delivered over its plan period in association with the house building sector and Homes for Scotland.
544	Taylor Wimpey	Have significant reservations as to the deliverability of the housing land requirement over the period to 2024. These are based upon the SG's failure to adequately reflect patterns of demand and housing market trends when distributing the housing land requirement and the significant and inappropriate over-reliance on constrained and windfall sites within the established housing land supply. The Scottish Borders is an example of both by having a housing requirement that is significantly in excess of need there and including constrained sites to meet this.
552	Scottish Property Federation	Edinburgh Waterfront will not deliver as envisaged. Concerned that other allocations anticipated in the Supplementary Guidance will fail to be realised and that there could be a requirement for expansion in the corridor within/between Edinburgh and West Lothian alongside public transport links. There is already expected to be significant expansion in Midlothian but this may need to be revisited in conjunction with the Borders in order to capitalise on the Borders railway development.
555	Ashfield Commercial Properties LTD	We support the additional allowance of 3,565 units to the East Lothian Council Strategic Development Area (SDA) . We do, however, consider that there needs to be further flexibility with this additional allowance and that East Lothian Council will need to 'increase their allowance' to take some further units from the City of Edinburgh which is more constrained in policy and physical terms. Goshen Farm could significantly assist East Lothian Council in meeting this. It is of a sufficient scale to provide the required infrastructure and is sustainable sites.

Response ID	Respondee	Summary
561	Mr Nick Lansdell	Not deliverable. Liaise with local communities and Community Councils to ensure that development is sympathetic to local need and concern. Ensure concerns regarding greenfield development, infrastructure pressure and quality life are met. Ensure that economic land is not given up for short term housing gain. Ensure that local authorities are monitored and moderated and that conflicts of interest between planning matters and land ownership are removed in the case of Council own land. Promote small scale development. Actively promote development in those areas which will benefit economically and promote transformation planning which is green and sustainable. Actively promote affordable housing and encourage developers away from focusing on premium development.
569	Mr Morrison	The Cammo site should not be developed. The cumulative effect with other West Edinburgh sites will not be able to be accommodated by the transport network and education provision.
580	Mr Archibald Clark	The finance is not available to achieve the required delivery rates. Factory constructed, component development could lead to quicker rates of construction rather than traditional methods. This could allow for taller developments up to 8 storeys.
591	Cadzow Estate	Not deliverable. The use of constrained sites will inhibit delivery and do not reflect areas of demand. West Lothian can deliver more homes, specifically the marketable eastern parts of West Lothian. Sites in West Lothian are not as deliverable.
595	I&H Brown Limited	Seek that the SG is very clear in steering the local authorities on the importance of securing the strategic land allocations first and delivering any additional allocations only in locations which do not undermine the existing SLA's. Support development of the Dunfermline Strategic Land Allocations.
<b>Question 6 - What can SESplan, the key agencies, developers and Scottish Government do to facilitate delivery of the strategic housing land requirement?</b>		
17	Alfred Stewart Properties	Strategic villages such as Crossford to the west of Dunfermline could accommodate significant growth with no impact on the proposed green belt for Dunfermline.
23	Regenco	Winchburgh has the environmental capacity to expand to the south using a discrete masterplanned approach taking into account local environmental factors and has demonstrated deliverability of development.
31	Liberton CC	All bodies should be involved in delivering road capacity to allow mitigate impact of development in and around Edinburgh.
38	Milesmark and Baldrige CC	Vacant property and land in Dunfermline Town Centre should be developed.
47	SNH	Can support through: assisting in delivery of green infrastructure in development; and supporting LDP, masterplan and development brief preparation.
55	Dr Tom Slater	Start again free of vested interests.
61	Mr Scott Mackenzie	Housing should be built to the highest efficiency and design standards.
69	Gladman	LDP preparation should not be delayed. 5 year land supplies must be maintained at all times. Infrastructure providers must be proactive in their roles to support development, including education authorities who should not use education capacity to restrict development.
76	SEPA	SEPA wishes to participate with SESplan, including on green networks and preparing a flood risk assessment.
88	Musselburgh Conservation Society	1. A commitment now to all the related transport and infrastructure improvements that are necessary to support the level of development proposed. 2. Clear and fair mechanisms put in place to require developers to contribute to the above. 3. Part of increased land values brought about by planning decisions to accrue to the state/local authorities for infrastructure provision. 4. Stop land-banking by imposing harsh financial penalties on developers who do it. 5. Significant increase in social housing provision. 6. Use compulsory purchase powers where allocated land is not coming forward for development.
94	Roslin & Bilston Community Council	Development should create pleasant environments. Each should be considered as if it were on decision makers doorsteps.

Response ID	Respondee	Summary
100	Cllr Dave Dempsey	This is an exercise being carried out by a small group of professionals without reference to the public whose lives will be affected by it
107	Mr Grant McCulloch	Need for a reappraisal of what Edinburgh people want. Development of existing sites should be incentivised. Protect the Green Belt.
117	Murieston Community Council	Scottish Government and developers must underwrite the necessary changes to the transport and strategic infrastructure.
121	Mrs Sally Chambers	Incentivise developers to deliver existing sites.
126	Miss Carolyn Campbell	Plans should enhance Edinburgh.
135	Banks Group	Need for innovative funding solutions for infrastructure. This should include TIF or similar.
142	Mr Alan Harrison	No. Incentivise brownfield development. Green belt, such as Cammo, should be preserved. It is home to many flora and fauna. Green Belt helps improve the environment for the local and adjacent communities. For anyone visiting the area it gives an excellent perception of the city.
149	Dr Simon Jackson	Brownfield sites should be developed. West Edinburgh should be developed near tram network.
151	Mr Colin Mackay	Within East Lothian West, consider further sites that do not adversely affect the area concentrated around Wallyford. Give greater weight to Blindwells. Consider the Cockenzie power station site as a significant brownfield site which could include the east most lagoon area at Prestongrange
165	McTaggart & Mickel Homes	The Scottish Government, SESPLAN and Local Authorities need to assist in the provision of infrastructure to deliver new housing. This should involve up front funding. LDP allocations need to be deliverable by the market.
175	Scottish Government	Transport Scotland would be in a position to engage with authorities to identify what mitigation might be appropriate to address the impact on the strategic transport network. It would then be possible to consider phasing of this mitigation, the levels of detriment that might be appropriate and to take an informed view on how cumulative impacts might be addressed through appropriate delivery mechanisms.
182	Mansell Homes	Too much of the existing supply is tied up in strategic land allocations which are not delivering at present. Effective land allocations are required to replace non-effective sites to be delivered over the plan period.
188	TMS Planning Services	Too much of the existing supply is tied up in strategic land allocations which are not delivering at present. Effective land allocations are required to replace non-effective sites to be delivered over the plan period.
194	Campion Homes	Too much of the existing supply is tied up in strategic land allocations which are not delivering at present. Effective land allocations are required to replace non-effective sites to be delivered over the plan period.
200	Muir Homes	Too much of the existing supply is tied up in strategic land allocations which are not delivering at present. Effective land allocations are required to replace non-effective sites to be delivered over the plan period.
213	Airthrie Estates	a) adjust the distribution proposed to favour areas of proven delivery, such as the east of West Lothian; b) make a specific allocation of additional land for the Winchburgh area; c) revisit the alleged infrastructure difficulties in the growth areas of West Lothian; d) accept the need to find a policy response to the qualitative dimension of need; e) looking to the post 2019 period, propose an Edinburgh City Region masterplan similar to those of proven longevity in several Scandinavian cities and historically around London; and f) speed up the review of SESplan
220	Strawson Property	1 Reassign the number of units to the East Lothian SDA as requested in these responses to meet demand and increase the prospects of a quicker recovery in the housing market within the SESplan area.2 Where brownfield opportunities are insufficient in any SDA, allocate greenfield sites in LDPs which adjoin the built-up areas of settlements. Owners or parties having control of these sites should be asked to demonstrate that the sites are effective and capable of delivering Housing units within the first period of the SDP i.e. up to 2019.
224	Grange and Prestonfield Community Council	Question the reason for delivering the strategic land requirement.

Response ID	Respondee	Summary
238	Cockburn Association	Need to deliver higher densities and the smaller dwelling types as required by the HNDA. This should be enforced through development management policies.
247	Kalewater Community Council	Build houses where there is a local need and not for the convenience of developers.
257	Haddington and District Amenity Society	1 Provide greater support for local authorities to review and consider the capacity of their areas before final decisions on housing numbers approved. 2 Block the ability of developers to gain approvals by appeal for non- determination. 3 Allow for further reviews of infrastructure requirements across the Plan area and not just considering requirements within individual local authority areas. There are significant links and co-ordinated improvements that could be made. Infrastructure requirements should also extend to consider the impact on existing Town centres. 4 Supporting Town Centres and the structure and operation of existing settlements must be linked to any decisions for new housing allocations. 5 Ensure process does not allow developments to come forward in piecemeal manner without suitable infrastructure improvements in place.
265	Barratt and David Wilson Homes	Failure to meet housing demand in the past has had implications for the scale of housing need over the next 10-20 years. Many large scale sites with infrastructure requirements have not delivered. Cannot wait until LDPs are adopted. In order to meet supply requirement interim guidance, such as in East Lothian, should be adopted. Local authorities and developers working together on bringing sites forward through interim guidance is far more advantageous and a better use of resources than a continued 'planning by appeal' approach.
277	Mr Martin Bailey	Fair and proper consultation to explain why the SESplan is necessary. Secondly, to offer land owners generous terms.
280	Dr David Mallon	Coastal villages should not be identified for new development.
288	Yeoman McAllister Architects	Many housing allocations do not take economic factors into account. Greater housing generosity, in and around the airport and Edinburgh's villages to the west will help facilitate the delivery of houses.
294	Mr Jon Grounsell	Delivery is dependent on finance and not land supply.
299	Balerno Community Council	There is a requirement for leadership by Scottish Government in particular rather than an unfortunate impression of abdication of responsibility. If Government wishes to abandon the Green Belt then it should say so; If not, and we have no reason to believe that it does, then it should stand up and say so.
303	Trustees of the Foxhall Trust	Consideration should be given to allowing preference to sites with identified market demand and to those that meet the effectiveness tests. Overestimation of the potential of the effective supply should be avoided.
312	EDI Brunstane	Further pragmatic and detailed dialogue with the SDPA an LPAs on delivery issues, up front infrastructure funding and provision of early phase works through funding that can be reimbursed by unit phases.
319	Straiton Parks Ltd.	SESplan, Key Agencies and Member Authorities can facilitate delivery of the strategic housing land requirement by taking a lead role in facilitating strategic infrastructure deliver. This infrastructure should be forward funded. Local Development Plans should be seen as business plans which demonstrate how enabling public investment can be used to attract private investment to an area and deliver growth.
329	Mrs Ruth Schofield	Consideration needs to be given to transport infrastructure, carbon footprint and the delivery rates of development. Is there a market for all these houses?
368	Ogilvie Homes	Development Plans must take account of what infrastructure can be delivered by the development industry. Developer contributions must be proportionate. As local authorities benefit from development they should fund infrastructure.
374	Ashdale Land & Property	Development Plans must take account of what infrastructure can be delivered by the development industry. Developer contributions must be proportionate. As local authorities benefit from development they should fund infrastructure.
381	Mrs Elaine Hutchison	Ensure housing land is in sustainable locations with the required infrastructure, meets all the desired National Outcome criteria as well as the planning principles
387	Mr Patrick Mitchell	More needs to be done to encourage brownfield developments. The current system encourages land banking.

Response ID	Respondee	Summary
399	Mrs Caitlin Hamlitt	Ensure that housing land is in sustainable locations in line with national planning policy, and that it meets all the desired National Outcome criteria. This will increase certainty for developers and communities and reduce the time and resource required for planning appeals.
407	Mr Jon Watkins	Need to justify need for housing and explain where matching jobs are.
411	Burnside	Infrastructure must be in place before development. Housing must be located where it is needed. Piecemeal development of large houses in unsustainable locations, such as Balerno, should not be supported. Developers must increase the housebuilding rate.
418	Juniper Green Community Council	Need to review housing need levels and the availability of all existing proposed sites, both brownfield and planned greenfield.
434	HPG Dalkeith	The SG must identify a generous supply of effective land in marketable areas where there is infrastructure capacity or this can be provided in accordance with Policy 7. The interim guidance provided by East Lothian and Fife is useful in this regard. Developers will respond to investment opportunities where these are well located and can be delivered in accordance with market demand. Where infrastructure constraints adversely affect land values without any public support the land will become unviable and ineffective. Agencies need to prioritise their Action Plan programmes and orientate these towards facilitating investment in preferred areas rather than spreading the budget too thinly.
435	Mr James Poseley	Plan should be started again with development focussed away from Green Belt and cities and towards growing regional towns and other areas.
445	Cramond & Barnton Community Council	Introduce a Land Tax on undeveloped brownfield sites. Provide the necessary infrastructure improvement funding, do not rely on this being achieved by development gain monies,
461	Firrhill Community Council	Scottish government and councils should promote and incentivise the development of brownfield sites.
474	Miller Homes East Scotland	Local authorities should work with developers when preparing plans. Allocated smaller sites unburdened by infrastructure requirements. Match public and private sector investment in infrastructure to deliver larger sites.
477	Mrs Blyth Peart	No comment.
486	Strutt & Parker	Allocate land in areas of need and demand. Identify, acknowledge, and resolve barriers and constraints to development rather than, as has been done here, avoiding them.
492	Dr Caroline Ritchie	The development of brownfield sites should be incentivised. Public sector land that is not required should be developed. The Government should increase the funding for social housing. Developers should not waste time and money by submitting applications that are contrary to government and plan aims.
500	Persimmon Homes East Scotland	Identify a generous land supply in the right places. Identify infrastructure funding solutions. Have can do attitude and allocate a generous supply of housing to meet the aspirations of a growing capital city. If SESplan and LDPs don't do this then the Scottish Government should. Key agencies to take the long term view on identifying infrastructure requirements.
504	Miss Sally Mackenzie	Consider using empty homes to meet need and develop brownfield sites.
511	Stewart Milne Homes	Housing need should be met where people want to live. Infrastructure investment costs should be shared between the public sector and the development industry. Development Plans should in effect be business plans showing how private investment can be attracted to an area with the assistance of enabling public investment.
520	Aberdour Community Council	Consult with appropriate experts in their fields, communicate and work as a team
525	Wallace Land Investment & Management	The inner boundary of the Edinburgh Green Belt should redefined in line with SPP. The additional capacity in East Lothian compared to previous positions is not explained.
535	Murray Estates	Allowances should be directed to where demand and need arise. Constrained sites in the allowances should be replaced with new effective sites in strong market locations. The refresh of the spatial strategy assessment contains little justification why West Edinburgh could not accommodate further development. Developing the Garden District would be more effective than redistributing the housing requirement further away in other local authority areas.



Response ID	Respondee	Summary
538	Hallam Land Management	The inner boundary of the Edinburgh Green Belt should be redefined in line with SPP. The additional capacity in East Lothian compared to previous positions is not explained.
545	Taylor Wimpey	Allowances should be directed to where demand and need arise. Constrained sites in the allowances should be replaced with new effective sites in strong market locations. Edinburgh, Midlothian and East Lothian have better prospects of housing delivery than Scottish Borders, which does not seem capable of delivering its requirement. The reasonable alternative sites in Midlothian are capable of delivery in the plan period.
556	Ashfield Commercial Properties LTD	Identify sites that are capable of delivery in the short to medium term and that are not burdened with overly restrictive infrastructure requirements or costs.
557	Scottish Property Federation	1. Review Edinburgh Waterfront with the consequences for non-delivery of its allocation acted on. 2. Push forward key public transport initiatives such as a new station in the Winchburgh development that is being delivered to market. 3. Agencies and Scottish Government should (continue) to pump prime infrastructure developments or improvements in key sites. Education and Transport appear to be the major constraints. A continued policy of seeking to phase where possible such infrastructure requirements would appear to be a sensible way forward.
562	Mr Nick Lansdell	Same as 562
570	Mr Morrison	Brownfield development should be prioritised and incentivised in preference to green belt and green field development.
581	Mr Archibald Clark	Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs. The Scottish Government is the key agency that bears this responsibility yet it appears to be leaving it to local authorities and developers to provide the allegedly needed housing - without having first decided how much good quality agricultural land must be retained to support the nation. There is an obligation on the Scottish Government to make that decision first before deciding the extent to which any built-up area can expand.
592	Cadzow Estate	SESPlan can comply with planning policy and adopting a realistic assessment of need and demand with which to inform the policies adopted to guide the supply of that demand. Adopt a flexible position towards land supply.
593	I&H Brown Limited	The further allocation of sites would have the potential to undermine some of the existing allocations which are crucial for the delivery of the associated infrastructure and strategic goals. In this context it is essential that forthcoming LDP's do not undermine the strategic allocations with early allocations of new sites outweigh the strategic land allocations SLA's.
<b>Question 7 - Are there any further comments on the draft Supplementary Guidance you would like us to consider?</b>		
8	Sports Scotland	Sports Scotland have a toolkit to help in plan making
10	Dr Gray	Flaw with HNDA use of trends and assumptions. The projected figures are not supported by past trends. Will lead to development of greenfield sites; Chosen strategy will lead to ribbon development from Midlothian through to Edinburgh City Centre.
18	Alfred Stewart Properties	Supplementary Guidance should specifically identify the Dunfermline Western Villages as a strategic location capable of accommodating additional growth
24	Regenco	Supports the ongoing identification of Winchburgh as a strategic development location
25	Liberton CC	SG should show breakdown of 2024-2032 housing need by member authority. Online questionnaire is too limited.
48	SNH	Support the design led approach.
49	Mr Mike Martin	Green Belt should be protected for the benefits it provides. Balerno is the least accessible part of Edinburgh. Transport infrastructure is already at capacity in Balerno and therefore further development cannot be accommodated. SG should meet government planning aims.

Response ID	Respondee	Summary
56	Dr Tom Slater	There is no evidence that building lots of housing will contribute to sustainable economic growth - in fact, quite the opposite. The SESplan reflects the imbalance of decision-making power in the post-2006Scottish local planning system in which the odds are stacked heavily in favour of developers and against the wishes of local communities.
62	Mr Scott Mackenzie	No further comment
64	Mrs Pauline McKenzie	Balerno is not a sustainable location for development due to transport capacity, congestion and green belt issues.
71	Gladman	In order to meet need, permission should be granted for sites in advance of LDP preparation. Historic under delivery should be brought forward and future under delivery should be factored into later in the plan period.
79	SEPA	Willingness to work with SESplan on flood risk and other issues.
81	Scottish Water	No comment
89	Musselburgh Conservation Society	No further comment.
90	Mr Alan Coupe	Fundamental principle of the Green Belt should be defended. Balerno is the least accessible part of Edinburgh. Transport infrastructure is already at capacity in Balerno and therefore further development cannot be accommodated. SG should meet government planning aims.
91	Mrs Beryl Moncrieff	There green belt must be protected. There are sufficient brownfield sites in Edinburgh that should be developed. Transport infrastructure in Balerno cannot accommodate further development.
96	Mr James Loftus	Green Belt should be preserved and not developed for commercial gain. Brownfield sites should be developed. Developing Green Belt will result in irreversible damage to the environment , biodiversity, wildlife and the loss of productive farm land. Balerno's traffic infrastructure cannot accommodate development as it is already congested.
101	ClIr Dave Dempsey	No comment
109	Upper Tweed Community Council	Rural development should be supported by public transport improvements and broadband access. Affordable Housing requirements should be lowered to enable development.
110	Mr D Allan	Green Belt must not be encroached on. Currie and Balerno are already traffic congested and links cannot be significantly improved to accommodate development.
111	Coal Authority	No specific comment
118	Murieston Community Council	SG should show split between existing LDPs and new housing demand. The main demand outwith City of Edinburgh is for affordable housing to meet the needs of the local communities. Exporting out the housing allocations from City of Edinburgh to these other SDAs leads to the eventual housing build being skewed towards providing large, expensive houses mainly purchased by families moving out of Edinburgh and does not serve the actual real needs of the local communities.
127	Miss Carolyn Campbell	Questions the need for and distribution of houses across Edinburgh
136	Banks Group	Need for call for sites encouragement as part of LDP process.
137	Mr Alexander Valentine	Green Belt should not be risked, especially when there are so many brownfield sites awaiting development. A need for housing should first be met by looking at abandoned properties and sites and also brownfield sites. Communities need to have a greater say in such developments rather than just profit driven developers. There are many reasons for preserving green belt land which include the following: environmental and conservation purposes, valuable agricultural land, unique landscapes and amenity benefits, preventing loss of community identity. Balerno is the least accessible part of Edinburgh. Transport infrastructure is already at capacity in Balerno and therefore further development cannot be accommodated. SG should meet government planning and SESplan SDP aims.
143	Mr Alan Harrison	Develop derelict land.
144	Dr Simon Jackson	SESplan should not use green field sites until ALL brownfield sites have been exhausted

Response ID	Respondee	Summary
150	Mr James Hardie	Land at Cammo should not be developed as there is no capacity in the transport network and in education capacity. The amenity, landscape, setting and environment of the Cammo estate would be negatively effected.
152	Mr Finlay Lockie	SEA is a blunt tool for allocating development. Large scale development East of Musselburgh (and specifically Goshen Farm) is not suitable because: 1. there are few new employment opportunities in the Musselburgh area which will lead to commuting; 2. little capacity on the Edinburgh North Berwick line; 3. travel from new development will therefore be principally car borne; and 4. existing congestion will be exacerbated. The infrastructure in this area is also not suitable. Namely because: there is not sufficient water infrastructure to delivery both Goose Bay and Goshen Farm; Goshen farm is affected by flooding and contains numerous former mine workings which could lead to problems; and this part of East Lothian is badly affected by air pollution which will be made worse by more car borne development. Other issues affecting the development of the site include: loss of green belt; loss of community identify; coalescence of surrounding settlements; loss of arable land; affecting Battle of Pinkie historic battlefield site; and affecting the setting of a listed building. Other sites should be examined and this should include a review of all 'undeliverable sites' to identify why that is. Other more suitable areas include the site east of Goshen farm, sites further east adjacent to the A1 and west of Musselburgh.
153	Mr T Mann	The park land of Hill Side school between Easter and Wester Aberdour and the grassland beside the harbour are vital elements in the unique character of the village.
164	McTaggart & Mickel Homes	City of Edinburgh Council has failed to plan for its expanding population and has required surrounding Local Authority areas to accommodate its housing land supply. City of Edinburgh Council must now make, admittedly, difficult decisions, to provide the supply of housing required to provide a range and choice of housing opportunities. Not providing an appropriate level of housing development encourages commuting and unsustainable development caused by leapfrogging of the Green Belt. Supply needs to be met where the housing demand is greatest. There is no evidence within the guidance or the technical note of an assessment capacities and infrastructure or whether a more appropriate planning solution would be for a greater amount of housing supply being provided in the area where the demand arises i.e. within the City of Edinburgh. There is no acknowledgement that housing plays an important role in a growing economy. Increasing density does not deliver attractive and sustainable developments. A large development should be allocated at the Gilmerton Station Road in the Edinburgh LDP. There is a lack of analysis in the Technical Note of the South East Edinburgh SDA. The level of housing expected to come forward from constrained sites is over estimated.
169	Mr Andrew Naylor	It essential to preserve and reinforce the existing boundaries of Green Belt land. It prevents sprawl, encourage biodiversity and offers leisure and recreation opportunities. Balerno cannot accommodate further development due to infrastructure capacity issues, including transport. Brownfield sites in Edinburgh should be developed instead.
176	Scottish Government	No further comment.
203	Mr Peter Scott	Developing the Garden District with housing and infrastructure would reduce the need for further housing in West Edinburgh. This would reduce pressure on transport infrastructure in this area.
214	Airthrie Estates	Winchburgh can accommodate further development. This area is supported by transport connections and available infrastructure capacity.
221	Strawson Property	No further comment.
222	Mr Pam Mackay	Scottish Government incentives / requirements for the development of existing brownfield sites would develop city centre sites, improve these areas, and protect the Greenbelt boundaries which contribute to the environmental qualities of the City. The Cammo fields are home to a great deal of wildlife, much of it endangered

Response ID	Respondee	Summary
223	Grange and Prestonfield Community Council	The consequences if the implied rate of housing completion is not achieved could be scattered piecemeal housing development and infrastructure provision in the wrong place with a consequential waste of financial and other resources. Consider lower rates of housing growth try to minimise these risks and ensure that as far as possible actual new housing and infrastructure provision are properly integrated over a range of possible economic scenarios. We therefore are concerned that the existing LDP safeguards and provisions about the green belt and open spaces may be inadequate to withstand the onslaught implied by the SG itself. We think that development should be LDP led and not Appeal led and we fear that local concerns are being swamped by a top-down policy which may prove to be unrealistic.
239	Cockburn Association	No further comments
241	Mrs Linda Allison	Green Belt should be protected for the benefits it provides. Balerno is the least accessible part of Edinburgh. Transport infrastructure is already at capacity in Balerno and therefore further development cannot be accommodated. SG should meet government planning aims.
248	Kalewater Community Council	There is a need to match new housing with jobs in rural areas.
249	Mr Ian Sandison	Land south of Cockburn Crescent, Balerno should not be developed as this would contradict with the aims of the plan. This is because; agricultural land will be lost; Cockburn Crescent is the clear boundary between Balerno and the Regional Park. Breaching this boundary would create a dangerous precedent; development will exacerbate existing infrastructure deficits; Balerno is the least accessible area in Edinburgh to employment; and existing traffic congestion will worsen.
258	Haddington and District Amenity Society	No further comments
282	Mr Martin Bailey	1. Democratic Deficit. Pre Christmas consultation period was not appropriate. 2. The language of the documents is impenetrable. 3. No clear explanation of the methodologies used, especially relating to previous exercises. 4 There seems scant attention paid to the environmental impacts of the various proposals. 5. No attention paid to the preservation or enhancement of the many beautiful and historic towns, villages, stretches of countryside, that seem to be threatened by over-development. 6. The balance between public and private finance of new housing is not clear. 7. What extent is requirement of 155k houses a catching-up exercise to cope with perceived inadequacies of supply? 8. The implications of independence are not discussed.
289	Yeoman McAllister Architects	Should consider sites where housebuilders are keen to develop, such as Ratho.
298	Mr Jon Grounsell	This plan is completely unsustainable as it knowingly increases traffic impacts and infrastructure costs. Demand is down and we need less land supply, not more, quite the opposite of what is proposed here.
300	Balerno Community Council	If Government truly 'value and enjoy our built and natural environment' then it will reject the housing requirement as unnecessary and unrealistic. If government truly also believe that we must 'reduce the local and global environmental impact of our consumption and production', then it will recognize that destruction of the diminishing pool of prime agricultural land is the antithesis of sustainability. If Government truly believes that 'we should live in well designed sustainable places' it would recognize that requiring housing development without access to good infrastructure and transport risks traffic congestion, increased pollution and longer journey to work times. In general terms this housing requirement would lead in the opposite direction to the claimed goal. In summary the Housing requirement will achieve precisely the opposite effect to that which Government apparently wishes to achieve.
313	EDI Brunstane	Brunstane can play a strategic part in providing the additional allowance proposed by the draft SG in the South East Edinburgh SDA (2,500 units), as part of a comprehensive green belt release. In accordance with SPP, we consider it is entirely appropriate for the SDPA to establish the need for a green belt and identify its broad area, which will support a sustainable distribution of growth. Further, Brunstane could play a role in satisfying increased additional allowances which we consider should be brought forward in the South East Edinburgh SDA as an established priority location, this being a more sustainable strategy than locating 4,530 units outwith SDAs. The assumed land supply of 83,207 units is questioned.

Response ID	Respondee	Summary
320	Mr Douglas Allison	Green Belt should be protected for the benefits it provides. Balerno is the least accessible part of Edinburgh. Transport infrastructure is already at capacity in Balerno and therefore further development cannot be accommodated. SG should aim to meet government planning aims.
321	Mr Dario Bianco	Principles of Green Belt must be defended. Balerno has insufficient transport infrastructure and is the least accessible part of Edinburgh. New developments must be allowed but only in a balanced, sustainable and community enhancing manner. Short term commercial development interests must not be permitted to hijack these long term sustainability policies.
322	Mr Clive Hembury	Prime agricultural land should be defended for the long term benefits it brings. Brownfield sites should be developed. Transport infrastructure in Balerno cannot accommodate further development. Building on green belt land will only result in the steady unsustainable decline in our green (and vital) spaces.
323	Portobello Community Council	Concerned that identifying all the additional greenfield/Greenbelt sites to meet housing requirements could undermine Brownfield regeneration.
324	Dr Quitin Bradshaw	Green Belt protects the countryside from urban sprawl. Development should be accommodated with the city limits which have high public transport accessibility. Brownfield sites should be developed first. Balerno's roads are congested and the transport network cannot accommodate new development. Developing out of town green belt sites will not meet government aims.
330	Mrs Ruth Schofield	By allocating greenbelt land to build on we will: 1 Negatively impact our future environment; 2 Negatively affect our transport and infrastructure; 3 Negatively affect the availability of prime agricultural land; and 4 Negatively impact our integrity as decision would go against underlying principles of the Council Planning.
331	Miss Kirsten Bradshaw	Green Belts must be protected. The Lanark Road is at capacity and further traffic may affect safety. Whilst there is a need for more housing, there is also the need to protect Green Belts. Brownfield sites should be developed.
332	Mr Rory Bradshaw	Green Belt round cities should be protected. Balerno is the least accessible location in Edinburgh and it's transport infrastructure could not accommodate further development. Accessible brownfield sites should be developed instead.
333	Dr Fiona Bradshaw	Green Belt should be protected from development. It instead should be directed to accessible brownfield sites. Balerno is not accessible to jobs the transport and education infrastructure are at capacity. Government aims should be to protect the environment whilst supporting communities and improving our nation. Destroying the green belt would only support the developers .
334	Mr Frank Phillips	The real need is for sustainable housing in areas where the environmental impact can be minimised having due regard for employment opportunities, low carbon travel and easy access to shops, health services, schools etc. The Green Belt around Balerno should not be developed as this would result in the loss of a desirable resource.
335	Mrs Mary Taylor	Opposed to development in Aberdour. It would lead to a loss of identity and impact on the character of the village. The road network is insufficient to accommodate further development.
336	McEwan	Green Belt around the Pentlands should be protected. Development in Balerno would lead to more sustainable out-commuting. Junctions on the Lanark Road are congested.
337	Ms Adele Shields	The Green Belt around Balerno should be protected. Balerno is the least accessible area to employment in Edinburgh. The Lanark Road is congested and transport infrastructure could not sustainably accommodate further development.
343	Mr Ewing Grainger	Green Belt should be protected for the benefits it provides. Balerno is the least accessible part of Edinburgh. Transport infrastructure is already at capacity in Balerno and therefore further development cannot be accommodated. SG should aim to meet government planning aims.
347	Mrs Gertrud Mallon	The Fife Outside SDAs allowance should be lowered. Coastal Villages should be protected. The Consultation Portal is not user friendly.
348	Lynn Mann	The Pentlands Green Belt must be protected for agriculture and amenity. There are sufficient brownfield sites within Edinburgh. Housing needs should be met in more sustainable locations.

Response ID	Respondee	Summary
349	Mrs Andrew Veitch	Land south of Cockburn Crescent, Balerno should not be developed. The character of the village would be affected. It would contradict aims of the plan. The one road out of Balerno is congested and cannot accommodate further development. Additionally, the local services e.g. health, education can in no way accommodate such prospective additional numbers. The sewage system would need to be complete upgraded. Green Belt should be protected and brownfield sites developed instead.
354	Mrs Anna Purdie	Fife (outwith the strategic development area) should have the proposed allocation of houses lowered. The cultural heritage and the coastal villages need to be preserved and the negative impact it will have on the area will be huge. The website is difficult to uses
355	Professor John Ensor	Green Belt should be protected for landscape, agriculture and community benefits. Balerno is not accessible to employment and development will lead to unsustainable travel. Development should be in accessible locations. Transport infrastructure in Balerno could not accommodate further development. Planning should be community focussed.
356	Professor John Ensor	Duplicate of 355
357	Ms Geraldine Jones	Green Belt should be protected as it prevents urban sprawl. Balerno is not a suitable place for development as it would lead to long commuting and would affect the character and amenity of the village. Development should be in sustainable locations.
358	Ms Geraldine Jones	Duplicate of 357
361	Mr Alan Pithie	Cammo residents are against the proposed development in the area. Democratic opinion should be respected.
376	Mrs Karon Gilhooley	There is sufficient brownfield land available for development in Edinburgh. Green Belt land should be protected for the environmental, agricultural and community benefits it brings.
382	Mrs Elaine Hutchison	One of the Government's 5 Strategic Objectives is to make a "Greener Scotland". Don't compromise this by allocating land for housing to meet a target that will mean that the Government's Strategic Objectives will fail: We value and enjoy our built and natural environment - bad decisions made now to meet a housing deadline could compromise our natural environment by building on greenbelt and prime agricultural land. Reduce the local and global environmental impact of our consumption and production - by building on agricultural land we are not moving towards our sustainability targets, become more self-sufficient and reducing food miles. We live in well designed sustainable places - by building in areas without access to good road infrastructure or public transport links, we are increasing the reliance on cars, increasing traffic congestion and increasing carbon dioxide emissions. By not considering the sustainability component (enhance the environment and reduce emissions) the Government will fail in its purpose to increase <u>sustainable economic growth</u> .
390	Mrs Genevieve MacKinlay	Green Belt must be protected for the benefits it brings. Transport infrastructure in Balerno is congested. Brownfield areas accessible to employment should be developed instead.
391	Mr Gordon MacKinlay	The Pentland Green Belt should be protected from development. Development should be located in locations accessible to employment. Wildlife would be significantly affected by Green Belt development.
394	Mr Christopher Bradshaw	The Green Belt in Balerno, and the benefits it brings, should be protected. Development in Balerno would contradict the sustainable aims of SESplan. Balerno's transport infrastructure is congested and could not accommodate further development.
400	Ms Maureen McCulloch	Housing should be in sustainable locations, close to or with good (especially public) transport links to employment/facilities. Easy to development car borne suburban developments is out of step with climate change and carbon reduction targets. Green Belt should be protected in South West Edinburgh and not replaced by 'stepford' type housing developments. The Lanark Road is already congested.
401	Mrs Caitlin Hamlitt	No further comments

Response ID	Respondee	Summary
412	Burnside	Development on the Green Belt must not be permitted and housing must be met where the need is. The type of housing required must be built, including affordable housing, not just the type of housing which will give maximum profit for the developer, it must be needs led and not developer led. Development must be supported by infrastructure.
419	Juniper Green Community Council	The policy SESplan are now required to implement will lead to unwelcome, unsustainable change. Measures need to be put in place to ensure developers use all brownfield sites to minimise the need for green field development. There is a complete lack of transparency in the current system for determining effective land supply, which means that developers seem to have a veto in being able to declare some brownfield sites as ineffective. Need a clearer statement from the Scottish Government that it remains committed to a policy of <u>protecting the long established green belts around Edinburgh and other settlements.</u>
436	Mr James Poseley	More opportunities should be given for communities to influence plan making.
437	Mrs Susan Warwick	Land at Cammo should not be developed because of 1. impact on congested transport network, 2. impact of ecology and animal species and 3 loss of arable land when promoting sustainability.
441	Mr Blair Melville	SESplan is a strategic plan characterised by a lack of strategic vision. It is a Plan wedded to outdated ideas about: 1 "constraints" as the driver of locations for development, not potential; 2 sacrosanct Green Belt with no thinking about form, purpose or competing planning objectives; 3 Seeking to force the market to operate in ways which it cannot achieve; 4 Brownfield being inherently better/more sustainable than green field/edge of settlement; and 5 Dispersing housing demand in ways which worsen sustainability especially around travel patterns. It has no sense of seeking to achieve outcomes which are in the national interest, despite it being one of a suite of strategies the remainder of which clearly seek economic growth, prosperity, equality of opportunity, higher standards and so on.
446	Cramond & Barnton Community Council	The Murray Estate's Edinburgh Garden District proposal could offer the critical mass sufficient to provide the major infrastructure improvements which would be required. This would reduce the impact on West Edinburgh and its infrastructure.
447	HPG Dalkeith	South East Edinburgh is being artificially restrained. It is not clear from spatial strategy refresh how the allowances for SE Edinburgh were derived. There is an ongoing reliance on non delivering existing commitments. More housing land is required to support Shawfair, which Cauldcoats Farm can provide. Midlothian's Housing Land Audit 2012 does not demonstrate a 5 year effective land supply. Green Belt and landscape arguments are outweighed by the strategic nature if the site and the need to meet housing needs at source. Coalescence has been mentioned without any references to place making. Prior to finalising the SG there is a need to: 1 properly allocate additional housing requirements across SDAs with a weighting in favour of distributing sites in accordance with demand and need; 2 Fully test effectiveness and programming against the overall strategy and housing targets (including affordable housing); 3 Cost and phase the requirements for education and transportation provision as part of a realistic Action Plan; 4 Ensure that planning obligations are realistic and viable using triggers, interim payments and phasing; and 5 Properly balance the economic benefits and environmental impact of proposed allocations within the SDA

Response ID	Respondee	Summary
448	HPG Dalkeith	It is the intention of HPG Dalkeith to pursue the plan led approach and potentially press forward with a planning application in due course. In the interim we would urge SESplan and Scottish ministers to review the SPG recommendation for South East Edinburgh in the light of overall SDP targets and the proposed allocations elsewhere which are far less sustainable. provision is required for the 'full range of stakeholders' to be involved in the preparation of the guidance including the development industry and the public. It is not clear how this has been implemented within the Midlothian area given the procedural relationship that currently exists between the respective SDP and LDP processes. In reality a new call for sites and detailed SEA should have been part of the SPG review. Conclusion demonstrates that Cauldcoats meets the planning objectives for sustainable development, as well as seamlessly integrating with the spatial strategy and settlement pattern being pursued by the Strategic Development Plan (SDP). Cauldcoats clearly has the potential capacity to accommodate development and a strong case is made to propose an amendment to the preferred strategy to fully take key policy and material factors into consideration.
453	Mr Philip Leng	The reasons for green belt policy have not changed and are now more relevant than ever. Housing development should be focussed in sustainable areas as has been suggested by the governments green policies and not dictated to by housing developers pressure to develop cheaper, easier green belt land. Transport infrastructure in Balerno is congested and cannot accommodate further development.
462	Firrhill Community Council	Understand the need for affordable housing but not convinced that greenfield development on the edge of the City will deliver this. It is time local authorities took control of the housing needs in their area and invested in new developments to meet those needs and where necessary through the compulsory purchase of land for such developments
476	Miller Homes East Scotland	Fife Council should adopt the East Lothian Council approach to 5 year land supply given the time taken to adopt plans.
478	Mrs Blyth Peart	Important to recognise the loss of agricultural land.
480	Dr Simon Nicholson	Green Belt round Balerno should be protected for the benefits it brings. Transport infrastructure in Balerno is congested and cannot accommodate further development.
487	Mr Lauchie Scougall	Green Belt should be protected for the benefits it provides. Transport infrastructure in Balerno is congested and cannot accommodate further development. Balerno has poor access to employment which will lead to out commuting and an increase in vehicle emissions. Developing in Balerno would be contrary to the aims of SESplan of locating development in accessible locations that can be sustainable developed.
493	Dr Caroline Ritchie	Concerned that housebuilding requirement will compromise sustainability and other Scottish Government objectives. Too many short term decisions are being made against long term objectives.
501	Persimmon Homes East Scotland	As 441. More information justifying the strategy in the technical note should be brought into the SG itself.
505	Aberdour Community Council	Housing requirements should not be dictated. Further consultation required.
512	Stewart Milne Homes	AS 441. SESplan is a strategic plan characterised by a lack of strategic vision. It is a Plan wedded to outdated ideas about: 1 "constraints" as the driver of locations for development, not potential; 2 sacrosanct Green Belt with no thinking about form, purpose or competing planning objectives; 3 Seeking to force the market to operate in ways which it cannot achieve; 4 Brownfield being inherently better/more sustainable than green field/edge of settlement; and 5 Dispersing housing demand in ways which worsen sustainability especially around travel patterns. It has no sense of seeking to achieve outcomes which are in the national interest, despite it being one of a suite of strategies the remainder of which clearly seek economic growth, prosperity, equality of opportunity, higher standards and so on. SESplan 2 should set out a 30-50 year vision.
522	Aberdour Community Council	Duplicate of 505. Housing requirements should not be dictated. Further consultation required.



Response ID	Respondee	Summary
526	Wallace Land Investment & Management	This Supplementary Guidance continues to be non-compliant with SPP but with no benefits to delivering sustainable economic growth. If this Supplementary Guidance is approved unchanged, then it will only lead to further delays, creating even more problems for the delivery of much needed housing land in the subsequent LDP process. It has the potential to stifle much needed investment and growth in a region that is the economic driver for Scotland. This is contrary to NPF and SPP.
539	Hallam Land Management	This Supplementary Guidance continues to be non-compliant with SPP but with no benefits to delivering sustainable economic growth. If this Supplementary Guidance is approved unchanged, then it will only lead to further delays, creating even more problems for the delivery of much needed housing land in the subsequent LDP process. It has the potential to stifle much needed investment and growth in a region that is the economic driver for Scotland. This is contrary to NPF and SPP.
546	Farningham Planning Ltd	There is an error in tables 8.17 and 8.19. Given the text in the document South West and North West Edinburgh should be identified as capable of accepting strategic development.
563	Mr Nick Lansdell	Focus on developing existing sites, rather than spreading effort and investment across new sites and lessening likelihood of plan success. Delivery of existing sites in West Lothian within the plan period is unlikely
564	Scottish Property Federation	There is little analysis of 'non-traditional' housing tenure within the Supplementary Guidance and yet Edinburgh is arguably one of the most attractive locations for build to rent activity in the UK. CEC should be encouraged to act upon this positive attraction. Building for market rental properties may actually deliver quicker returns in terms of housing supply than the traditional home buying sector. If a major increase in supply of this tenure can be achieved then this may act to relieve pressure upon other parts of the region to deliver more traditional forms of housing quickly. That there is a potential clash between where the Supplementary Guidance and planning authorities are seeking investment and where the private sector believes housing investment can be delivered. This could lead to inertia which will benefit neither the development industry nor the delivery of local and central government policy. We believe there must be some scope for controlled development of urban centres, in particular where they coincide with appropriate infrastructure developments. This could be done with a view to reinvesting appropriately defined revenues to the support of brownfield sites retained within the existing development plan.
571	Mr Morrison	A through analysis of the ecological and traffic situation at Cammo is required.
582	Anonymous	Duplicate of 584. It is disturbing to note that Reporters appear to be more concerned about local authorities meeting their housing needs by reference to SESplan than ensuring that the democratically approved Local Plan is applied. Planning approval by Appeal is not a suitable process and will lead to unsustainable development and landbanking.
584	Mr Archibald Clark	It is disturbing to note that Reporters appear to be more concerned about local authorities meeting their housing needs by reference to SESplan than ensuring that the democratically approved Local Plan is applied. Planning approval by Appeal is not a suitable process and will lead to unsustainable development and land banking.
585	Susan Kirby	Green Belt around Balerno should not be developed because: it is not accessible to employment and has limited public transport access; would lead to a loss of productive farmland; and the Green Belt is to stop urban sprawl.
586	Cadzow Estate	concerned that the Supplementary Guidance has failed to make adequate provision for housing land in the SESplan. Concerned that it has not sufficiently considered housing in the West Edinburgh/East West Lothian interface. Land at Kilpunt Farm is flexible, unconstrained, available immediately and capable of delivering large supply of housing.
594	I&H Brown Limited	Support for Fife Council's continued position on Dunfermline's expansion to the West, North and North West.
596	North Berwick Community Council	North Berwick is already accommodating an amount of new development. The existing infrastructure cannot cope with a huge influx of new houses and that the life style currently enjoyed by residents will be ruined. If new development is to occur it should be for smaller, affordable homes for local people. We would urge that new homes should be built as closely as possible to employment opportunities and transport links.

Response ID	Respondee	Summary
597	Helen McCallum	If development is permitted in Aberdour it will destroy the seaside character of the village and the attractiveness of the beach. Development should be located towards Kinross instead.
598	Barratt and David Wilson Homes	Over reliance on distributing Edinburgh's need to Midlothian and Scottish Borders. Reconsideration is required to accommodate a higher proportion of Edinburgh's demand within the north-west, south-west, south-east and west of the city. Additional allowances in Fife appear over-optimistic and should be re-directed toward Edinburgh. Interim guidance on land supply, like East Lothian is required to be adopted by other authorities.
599	Jenny Parsons	Same as 152. SEA is a blunt tool for allocating development. Large scale development East of Musselburgh (and specifically Goshen Farm) is not suitable because: 1. there are few new employment opportunities in the Musselburgh area which will lead to commuting; 2. little capacity on the Edinburgh North Berwick line; 3. travel from new development will therefore be principally car borne; and 4. existing congestion will be exacerbated. The infrastructure in this area is also not suitable. Namely because: there is not sufficient water infrastructure to delivery both Goose Bay and Goshen Farm; Goshen farm is affected by flooding and contains numerous former mine workings which could lead to problems; and this part of East Lothian is badly affected by air pollution which will be made worse by more car borne development. Other issues affecting the development of the site include: loss of green belt; loss of community identify; coalescence of surrounding settlements; loss of arable land; affecting Battle of Pinkie historic battlefield site; and affecting the setting of a listed building. Other sites should be examined and this should include a review of all 'undeliverable sites' to identify why that is. Other more suitable areas include the site east of Goshen farm, sites further east adjacent to the A1 and west of Musselburgh.
600	Jimmy Anderson	Same as 152. SEA is a blunt tool for allocating development. Large scale development East of Musselburgh (and specifically Goshen Farm) is not suitable because: 1. there are few new employment opportunities in the Musselburgh area which will lead to commuting; 2. little capacity on the Edinburgh North Berwick line; 3. travel from new development will therefore be principally car borne; and 4. existing congestion will be exacerbated. The infrastructure in this area is also not suitable. Namely because: there is not sufficient water infrastructure to delivery both Goose Bay and Goshen Farm; Goshen farm is affected by flooding and contains numerous former mine workings which could lead to problems; and this part of East Lothian is badly affected by air pollution which will be made worse by more car borne development. Other issues affecting the development of the site include: loss of green belt; loss of community identify; coalescence of surrounding settlements; loss of arable land; affecting Battle of Pinkie historic battlefield site; and affecting the setting of a listed building. Other sites should be examined and this should include a review of all 'undeliverable sites' to identify why that is. Other more suitable areas include the site east of Goshen farm, sites further east adjacent to the A1 and west of Musselburgh.

Response ID	Respondee	Summary
601	Mr Jonathan Gillies	<p>We wish to register our opposition to the additional development of land in the East Lothian West (particularly Goshen Farm) area on the grounds that: 1 it is likely to result in loss or use of a significant area of Green Belt land; 2 it would destroy the cultural value of an important part of the historically significant site of the Battle of Pinkie, recently designated; 3 it is part of the setting of Drummohr House; 4 The current application affecting Goshen Farm would be use of prime agricultural land; 5 development of any further land in East Lothian West advances the coalescence of Musselburgh and Prestonpans; 6 there is little or no prospect of any increase in commuter rail capacity, so the Edinburgh-bound transport load will fall on Musselburgh High Street and Salter's Road. Both these routes are already at full capacity for much of the day. Musselburgh High Street air quality is below national standards. Any increased load on these routes would be intolerable; 7 Development of any further sites in the East Lothian West vicinity, in addition to Goose Bay, would produce excessive urbanisation around Wallyford with a lack of satisfactory integration with existing communities; 8 Existing mains water supply capacity is only adequate for the Goose Bay development; and 9 There requires to be a major improvement in capacity of infrastructure - for instance Secondary schooling - before such significant additional housing is contemplated. New housing allocations should be made either to the west of Musselburgh (e.g., land adjacent to QMU campus), or sufficiently to the East, and with access to the A1(e.g., Blindwells, Cockenzie Power Station), so that Edinburgh-bound traffic will take this route.</p>
602	Jan Samuel	<p>As 601. We wish to register our opposition to the additional development of land in the East Lothian West (particularly Goshen Farm) area on the grounds that: 1 it is likely to result in loss or use of a significant area of Green Belt land; 2 it would destroy the cultural value of an important part of the historically significant site of the Battle of Pinkie, recently designated; 3 it is part of the setting of Drummohr House; 4 The current application affecting Goshen Farm would be use of prime agricultural land; 5 development of any further land in East Lothian West advances the coalescence of Musselburgh and Prestonpans; 6 there is little or no prospect of any increase in commuter rail capacity, so the Edinburgh-bound transport load will fall on Musselburgh High Street and Salter's Road. Both these routes are already at full capacity for much of the day. Musselburgh High Street air quality is below national standards. Any increased load on these routes would be intolerable; 7 Development of any further sites in the East Lothian West vicinity, in addition to Goose Bay, would produce excessive urbanisation around Wallyford with a lack of satisfactory integration with existing communities; 8 Existing mains water supply capacity is only adequate for the Goose Bay development; and 9 There requires to be a major improvement in capacity of infrastructure - for instance Secondary schooling - before such significant additional housing is contemplated. New housing allocations should be made either to the west of Musselburgh (e.g., land adjacent to QMU campus), or sufficiently to the East, and with access to the A1(e.g., Blindwells, Cockenzie Power Station), so that Edinburgh-bound traffic will take this route.</p>
603	Mr Alan Watson	<p>Same as 152. SEA is a blunt tool for allocating development. Large scale development East of Musselburgh (and specifically Goshen Farm) is not suitable because: 1. there are few new employment opportunities in the Musselburgh area which will lead to commuting; 2. little capacity on the Edinburgh North Berwick line; 3. travel from new development will therefore be principally car borne; and 4. existing congestion will be exacerbated. The infrastructure in this area is also not suitable. Namely because: there is not sufficient water infrastructure to delivery both Goose Bay and Goshen Farm; Goshen farm is affected by flooding and contains numerous former mine workings which could lead to problems; and this part of East Lothian is badly affected by air pollution which will be made worse by more car borne development. Other issues affecting the development of the site include: loss of green belt; loss of community identify; coalescence of surrounding settlements; loss of arable land; affecting Battle of Pinkie historic battlefield site; and affecting the setting of a listed building. Other sites should be examined and this should include a review of all 'undeliverable sites' to identify why that is. Other more suitable areas include the site east of Goshen farm, sites further east adjacent to the A1 and west of Musselburgh.</p>

Response ID	Respondee	Summary
604	Mr Keith Forrest	<p>Same as 152. SEA is a blunt tool for allocating development. Large scale development East of Musselburgh (and specifically Goshen Farm) is not suitable because: 1. there are few new employment opportunities in the Musselburgh area which will lead to commuting; 2. little capacity on the Edinburgh North Berwick line; 3. travel from new development will therefore be principally car borne; and 4. existing congestion will be exacerbated. The infrastructure in this area is also not suitable. Namely because: there is not sufficient water infrastructure to delivery both Goose Bay and Goshen Farm; Goshen farm is affected by flooding and contains numerous former mine workings which could lead to problems; and this part of East Lothian is badly affected by air pollution which will be made worse by more car borne development. Other issues affecting the development of the site include: loss of green belt; loss of community identify; coalescence of surrounding settlements; loss of arable land; affecting Battle of Pinkie historic battlefield site; and affecting the setting of a listed building. Other sites should be examined and this should include a review of all 'undeliverable sites' to identify why that is. Other more suitable areas include the site east of Goshen farm, sites further east adjacent to the A1 and west of Musselburgh.</p>
605	Mr Malcolm Durney	<p>As 601. We wish to register our opposition to the additional development of land in the East Lothian West (particularly Goshen Farm) area on the grounds that:1 it is likely to result in loss of Green Belt land; 2 it would destroy the cultural value of an important part of the historically significant site of the Battle of Pinkie; 3 it is part of the setting of Drummohr House; 4 The current application affecting Goshen Farm would be use of prime agricultural land; 5 development of any further land in East Lothian West advances the coalescence of Musselburgh and Prestonpans; 6 there is little or no prospect of any increase in commuter rail capacity, so the Edinburgh-bound transport load will fall on Musselburgh High Street and Salter's Road. Both these routes are already at full capacity for much of the day. Musselburgh High Street air quality is below national standards. Any increased load on these routes would be intolerable; 7 Development of any further sites in the East Lothian West vicinity, in addition to Goose Bay, would produce excessive urbanisation around Wallyford with a lack of satisfactory integration with existing communities; 8 Existing mains water supply capacity is only adequate for the Goose Bay development; and 9 There requires to be a major improvement in capacity of infrastructure - for instance Secondary schooling - before such significant additional housing is contemplated. New housing allocations should be made either to the west of Musselburgh (e.g., land adjacent to QMU campus), or sufficiently to the East, and with access to the A1(e.g., Blindwells, Cockenzie Power Station), so that Edinburgh-bound traffic will take this route.</p>
606	Mrs Arlene Reid	<p>As 601. We wish to register our opposition to the additional development of land in the East Lothian West (particularly Goshen Farm) area on the grounds that:1 it is likely to result in loss of Green Belt land; 2 it would destroy the cultural value of an important part of the historically significant site of the Battle of Pinkie; 3 it is part of the setting of Drummohr House; 4 The current application affecting Goshen Farm would be use of prime agricultural land; 5 development of any further land in East Lothian West advances the coalescence of Musselburgh and Prestonpans; 6 there is little or no prospect of any increase in commuter rail capacity, so the Edinburgh-bound transport load will fall on Musselburgh High Street and Salter's Road. Both these routes are already at full capacity for much of the day. Musselburgh High Street air quality is below national standards. Any increased load on these routes would be intolerable; 7 Development of any further sites in the East Lothian West vicinity, in addition to Goose Bay, would produce excessive urbanisation around Wallyford with a lack of satisfactory integration with existing communities; 8 Existing mains water supply capacity is only adequate for the Goose Bay development; and 9 There requires to be a major improvement in capacity of infrastructure - for instance Secondary schooling - before such significant additional housing is contemplated. New housing allocations should be made either to the west of Musselburgh (e.g., land adjacent to QMU campus), or sufficiently to the East, and with access to the A1(e.g., Blindwells, Cockenzie Power Station), so that Edinburgh-bound traffic will take this route.</p>

Response ID	Respondee	Summary
607	The Community Council of the Royal Burgh of Peebles and	The increased housing requirements affecting Peebles are excessive.

**APPENDIX B**

Summary of the main issues raised by the Consultation Responses Received and SESplan Responses to the Consultation Responses Recieved on the draft Supplementary Guidance on Housing Land

## Summary of Main Issues (By Alphabetical Order)

The full responses are available to view and download at -

<http://sesplan-consult.objective.co.uk/portal/sg/hsgland>

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
<b>A - Brownfield</b>				
A1	113, 234, 295, 342, 233, 144, 149, 419, 331, 504, 143, 169, 322, 110, 96, 570, 222, 349, 380, 390, 251, 325., 459, 579, 348, 137, 402, 332, 91, 376, 350, 416	Brownfield sites should be maximised first. Priority should be given to brownfield opportunities. There is sufficient brownfield land within Edinburgh to meet the required need and demand.	The approved Strategic Development Plan (SDP) gives priority to brownfield sites. When preparing Local Development Plan (LDPs) Member Authorities should give priorities to brownfield sites if it is shown that can be delivered over the plan period.	Not required in this instance
A2	445, 492, 461, 142, 402, 570, 222, 387, 380, 390, 564	Brownfield sites should be incentivised.	SESplan will raise the issue of incentives with Member Authorities and the Scottish Government.	Not required in this instance
A3	466, 504, 137, 380, 53	Research suggests there are 10,000 empty homes in Edinburgh. These should be brought back into use before releasing greenfield land. Empty homes should be used to meet need.	The level and type of empty homes that can be brought back into use could be considered in meeting the housing requirement in LDP preparation.	Not required in this instance
A4	457, 323	The numbers will undermine the delivery of housing on existing brownfield sites.	The approved SDP indicates that brownfield sites should be prioritised and that new development proposals will complement not undermine the delivery of existing committed development.	Not required in this instance
<b>B - Completions</b>				
B1	13, 19, 14, 20	Table 3.2 of the Technical Note shows completions incorrectly as 4,451, this figure should be 4,437.	The latest information for completions is 4,451. The figure of 4,437 comes from totalling the number of completions as reported and published in the annual Housing Land Audits (2010, 2011 and 2012). However, when discussing Audits with the development industry, errors / omissions from previous Audits are advised. The figures cannot be updated in published documents but are recorded on the Housing Land Audit database.	Not required in this instance
B2	308, 393	The Guidance has been drafted on the basis that a very significant increase in completions will occur. This is questioned.	Completions will need to increase from recent levels. SESplan and Member Authorities will be working with the development industry, key agencies and the Scottish Government to increase housing delivery rates towards delivering a long term strategy.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
<b>C - Constrained</b>				
C1	13,14, 19, 20, 162, 168, 308, 519, 528, 163, 365, 371, 11, 485, 544, 497, 509, 531, 542, 167, 498, 508, 533	The figures are based on unsubstantiated assertions and overstated.	The figures were drawn from the agreed Housing Land Audit (HLA) 2012. The purpose of the Supplementary Guidance is not to demonstrate a 5 year land supply or to allocate individual development sites but to identify a housing land requirement that will enable the delivery of the vision, aims and spatial strategy of the approved SDP.	Not required in this instance
C2	16, 427, 449, 164, 529, 533, 22, 547, 314, 219, 485, 540, 301	Constrained land will not fully deliver over period	Effective supply is to be reviewed during LDP preparation to meet the requirements set out in table 3.1. This is set out in the Approved SDP and paragraph 3.8 of the Supplementary Guidance. All constrained development is not anticipated to be delivered within the plan period.	Not required in this instance
<b>D - Delivery</b>				
D1	212, 69, 499	Planning making delays will prevent delivery	LDPs are progressing following the adoption of the SDP and the forthcoming approval of the Supplementary Guidance.	Not required in this instance
D2	409, 54, 56, 455, 427, 417, 580, 106, 292, 294, 33, 411, 237, 385, 398, 380, 264, 311, 460, 428, 120, 298	Lack of finance/state of economy preventing delivery. The required rates are not realistic prevent short term delivery.	The SDP and LDPs can promote sustainable economic growth which will support delivery of the ambitious plan. Completions will need to increase from recent levels. SESplan and Member Authorities will be working with the development industry, key agencies and the Scottish Government to increase housing delivery rates towards delivering a long term strategy.	Not required in this instance
D3	593, 595, 563, 380	Further allocation of sites could undermine delivery of existing sites	The SDP sets out that "New development proposals will complement and not undermine the delivery of existing committed development".	Not required in this instance
D4	71	Under delivery to be factored later into plan period	Member authorities will base their 5 year land supply calculations on the period 2009-2024.	Not required in this instance
D5	68, 537, 418, 524	LDPs to re-assess land supply in LDP preparation	Paragraph 23 of the approved SDP sets out that the LDPs will re-assess the ability of sites to deliver completions by 2024. Paragraph 3.13 of the Supplementary Guidance required 5 year land supply calculations to be factored into LDP preparation.	Not required in this instance
D6	71, 472	Sites need to be permitted before LDPs prepared	Where they accord with policy, the SDP does not prevent this.	Not required in this instance



Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
D7	265, 587, 189, 177, 182, 428, 195, 200, 87, 270, 552, 183, 188, 194	Existing strategic sites are not delivering	The SDP sets out to deliver a long term vision which should not be discarded for unsustainable short term gains. The approved SDP states that the spatial strategy builds on existing committed development. New development proposals will complement and not undermine the delivery of existing committed development.	Not required in this instance
D8	434, 181, 182, 469, 199, 200, 535, 495, 500, 486, 545, 187, 188, 301, 194, 303	Need generous supply of effective sites in marketable areas	The strategy set out in the SDP of focussing new development in the identified SDAs, was approved by Scottish Ministers. These areas are considered marketable and align with areas of housing need and build on future opportunities.	Not required in this instance
D9	385	Sufficient existing sites.	Constraints on some of these sites will prevent delivery within the plan period. This issue is assessed annually by member authorities.	Not required in this instance
D10	598, 265, 476	Need for East Lothian Five Year Land Supply approach.	This is an LDP matter. Approved SDP policy 7 sets out the position on 5 Year Land Supply.	Not required in this instance
D11	474	Identify smaller sites without infrastructure requirements.	This is an LDP matter.	Not required in this instance
D12	107, 121	Existing sites should be incentivised.	The SDP sets out that "New development proposals will complement and not undermine the delivery of existing committed development".	Raise the issue of incentives with the appropriate bodies.
D13	492, 88	Increasing funding for social housing.	This is not a matter that the Supplementary Guidance can address. The comments will be forwarded to the Scottish Government and the Member Authorities.	Not required in this instance
D14	557	Push public transport initiatives to support development.	The SESplan Action Programme seeks to deliver strategic transport interventions to support development. More local initiatives will be set out in LDPs and Local Transport Plans.	Not required in this instance
D15	312, 520	Need for discussion between developers/land owners and LPAs and SDPA on delivery issues. Need to work together.	There is a proposed workshop between Homes for Scotland and SESplan members on delivery issues.	Not required in this instance
D16	434	Need to prioritise action programme.	The next Action Programme will contain details on priorities. This will build on work that is already underway.	Not required in this instance
D17	88	Use compulsory purchase where allocated land is not being developed.	SESplan does not have these powers. These comments will be passed onto Member Authorities and the Scottish Government.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
D18	109	Lower affordable housing requirements to enable delivery.	This would conflict with achieving other strategic goals. Affordable housing requirements are set by LDPs. This comment will be forwarded to Member Authorities.	Not required in this instance
D19	433	Greater critical mass of SDAs required to allow delivery.	The scale of the SDAs has been assessed through a robust site assessment exercise. LDPs will allocate specific sites within SDAs.	Not required in this instance
D20	556	Low cost and low infrastructure sites required.	All sites have a cumulative impact on infrastructure.	Not required in this instance
D21	550	Do not maintain the status quo of simply relying on allocated sites/ commitments which are undeliverable in their current form.	LDPs will review the level of allocations required to deliver the housing requirement.	Not required in this instance
D22	34, 46, 60, 246, 475	The distribution of the SESplan housing requirement is deliverable.	Noted.	Not required in this instance
D23	99	Housing will only be delivered if it is in housebuilders interests.	Completions will need to increase from recent levels. SESplan and Member Authorities will be working with the development industry, key agencies and the Scottish Government to increase housing delivery rates towards delivering a long term strategy.	Not required in this instance
D24	275	Land delivery is only the start of the building process.	This is acknowledged.	Not required in this instance
D25	518, 477	No comment on delivery.	Noted.	Not required in this instance
D26	247	Build houses where there is a local need and not for the convenience of developers.	It is an aim of the Supplementary Guidance to meet housing need where it arises.	Not required in this instance
D27	277	Landowners to be offered incentives/generous terms to enable delivery.	This is not within the remit of SESplan. The comments will be forwarded to the Scottish Government.	Not required in this instance
<b>E - Density</b>				
E1	162, 168, 163, 167, 164, 431	Increasing densities as a mathematical exercise is simplistic and does not deliver sustainable development.	Densities of specific developments is an LDP matter. However, higher density developments are more sustainable as they support sustainable transport more easily than low density development and are a more efficient use of land. Densities will be set appropriate to their context. NPF3 paragraph 2.19 refers to increasing density in cities to accommodate growth.	No change on density
E2	577, 237, 291	Densities should be increased and minimum requirements set.	Densities will be set appropriate to their context.	No change on density

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
<b>F - Effective Supply</b>				
F1	13, 19, 14, 20, 16, 430, 451, 456, 313, 449	If the process was undertaken in a robust manner the effective supply would be smaller and the additional housing land requirement larger as a result. It is questioned.	The process was undertaken using HLA 2012, which was the most recent information available during preparation. Effective supply is to be reviewed during LDP preparation to meet the requirements set out in table 3.1. This is set out in the Approved SDP and the Supplementary Guidance.	Not required in this instance
F2	455, 419, 290, 387	Question developers role in effective land process	SESplan made representations to the Scottish Government on the operation of the 5 Year Land Supply process and effective land for the review of SPP. The issue is being considered by the Scottish Government.	Not required in this instance
F3	308, 430, 497	Insufficient explanation as to the how the housing land supply has been calculated and how this is based on Housing Land Audit 2012.	The figures are based on HLA 2012 which are available from each member authority.	Not required in this instance
F4	16, 22	Housing Land Audit 2012 is flawed.	Housing Land Audits are agreed by each member authority.	Not required in this instance
F5	447	Need to fully test effectiveness	It is not the role of a Strategic Development Planning Authority to test the delivery and effectiveness of each housing site across the region.	Not required in this instance
F6	136	Need for SG to require LDPs to be informed by an update to date 'call for sites' process.	This is a matter for individual member authorities in preparing their LDPs.	Not required in this instance
<b>G - Further Actions</b>				
G1	213	Quicker review of SESplan	The SESplan SDP2 Main Issues Report will be produced and consulted upon late in 2014.	Not required in this instance
G2	213	Create Edinburgh City Region Masterplan	The SESplan SDP2 Main Issues Report will be produced and consulted upon late in 2014.	Not required in this instance
<b>H - General</b>				
H1	383, 377, 326, 400	Pressure on Councils to permit large, unsustainable, peripheral greenfield development	New development proposals will complement and not undermine the delivery of existing committed development. Whilst brownfield sites will be prioritised, delivery of the housing requirements will required development on greenfield sites.	Not required in this instance
H2	582, 256, 584, 88	Planning by appeal is unsustainable. It leads to landbanking, which should be penalised.	This is not a matter for SESplan but the comments will be forwarded to the Scottish Government.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
H3	257	Outlaw non-determination appeals	This is not a matter for SESplan but the comments will be forwarded to the Scottish Government.	Not required in this instance
H4	488, 54, 137, 436, 561, 355, 50, 95, 100, 562	Financial and developer interests are being promoted over community interests. Communities and the public have not been considered and should be given a say.	Planning is about achieving a sustainable development which often involves a balance between competing interests. There have been opportunities for public and community involvement in the preparation of the SDP. There will be further opportunities during LDP preparation.	Not required in this instance
H5	361	Democratic opinion should be respected	Planning is about achieving a sustainable development which often involves a balance between competing interests. There have been opportunities for public and community involvement in the preparation of the SDP. There will be further opportunities during LDP preparation. Decisions on the Supplementary Guidance will be made by elected representatives.	Not required in this instance
H6	527, 474, 517	Has not worked with house building sector	This is incorrect. The SDPA meet with Homes for Scotland multiple times during the Supplementary Guidance preparation process. The SDPA were all also fully aware of the house building sector's views through the SDP examination process.	Not required in this instance
H7	223, 448, 584, 462	Development should be plan lead not appeal lead	The SDPA supports this.	Not required in this instance
H8	448	Should have undertaken a call for sites	The Supplementary Guidance is informed by site availability information provided by member authorities.	Not required in this instance
H9	282	Language of documents is impenetrable	This will be taken into account when creating future planning documents.	Not required in this instance
H10	505, 25, 282	Further consultation required/consultation inadequate.	Consultation procedures will be considered before future consultations. LDPs will have consultation stages in as part of their preparation.	Not required in this instance
H11	354, 347	Website is difficult to use.	We will raise this with the organisation that operate the Consultation Portal	Not required in this instance
H12	109	Rural development requires to be support by public transport and broadband access	Initiatives are underway to increase broadband access and public transport accessibility in rural area. The Borders Railway is one such project seeking to improve public transport accessibility in rural areas. These comments will be passed onto the Scottish Government.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
H13	248	Matching new housing with jobs in rural areas	The SDP seeks to grow the rural economy.	Not required in this instance
H14	118	Guidance should show the split between existing LDPs and new demand	The Supplementary Guidance shows the current existing land supply.	Not required in this instance
H15	282	No attention to environmental impacts of proposals	Environmental designations were considered as part of the spatial strategy process. The specific impacts of development will be considered as part of the site masterplanning, design and development management processes. An Strategic Environmental Assessment accompanied the draft Supplementary Guidance which examined its potential environmental impacts and mitigations.	Not required in this instance
H16	238	Build smaller house-types to meet need	This comments will be forwarded for LDPs to consider.	Not required in this instance
H17	546	Errors in tables 8.17 and 8.19	This is acknowledged and will be rectified.	Correct error.
H18	73, 77	Flood risk should be assessed/given more consideration	Flood risk is assessed as part of the updated Spatial Strategy Assessment. Flood risk is addressed in approved SDP policy 15.	Not required in this instance
H19	511, 319	Development plans should operate as business plans for investment	A key focus of the SDP is promoting investment and economic growth.	Not required in this instance
H20	407	Where are the jobs to match the additional houses.	A key focus of the SDP is promoting investment and economic growth.	Not required in this instance
H21	559	Economic sites should be protected.	It is not proposed to develop housing on quality economic development sites.	Not required in this instance
H22	55	The process should begin again free of vested interests.	The SDP was approved by Scottish Ministers. Involvement is sought from all interested parties.	Not required in this instance
H23	61	Housing should be built to the highest efficiency and design standards.	This is supported and will be addressed in LDPs.	Not required in this instance
H24	88	Development should create pleasant environments	SESplan and our Member Authorities wish to help deliver quality development. Place making is recognised in the SDP. Detailed design policies will be set out in LDPs.	Not required in this instance
H25	8	Promoting the Sports Scotland plan making toolkit.	The toolkit is welcomed and our member authorities will utilise it in LDP preparation.	Not required in this instance
H26	62, 81, 89, 101, 111, 176, 221, 239, 258, 401	No further comment.	Noted.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
<b>I - Generosity</b>				
I1	178, 184, 190, 196, 315, 555, 592, 497, 498	The land requirement should be a factor of 20% or more higher than the number of house units/need for flexibility allowance.	Approved SDP policy 6 sets out the position on housing land flexibility. Percentage requirements are not set out in the current SPP.	Not required in this instance
I2	413	SPP is not clear on the definition of a generous supply.	This is being looked at in the review of SPP.	Not required in this instance
I3	271	The guidance should allow for housing developments in sustainable locations to be permitted to allow for sites to come forward.	Approved SDP policy 6 sets out the position on housing land flexibility.	Not required in this instance
<b>J - Green Belt</b>				
J1	119, 234, 294, 327, 378, 414, 426, 488, 412, 333, 480, 336, 331, 90, 142, 137, 169, 394, 110, 321, 320, 343, 334, 391, 107, 249, 96, 402, 487, 49, 565, 222, 425, 453, 332, 349, 91, 390, 376, 241, 328, 33, 337, 357, 400, 355, 585, 578, 567, 285	The Green Belt should be protected for the benefits it provides.	The Green Belt was examined in the Spatial Strategy Assessment for both the SDP and the update in the Supplementary Guidance. The importance of the Green Belt and its purposes are acknowledged in SDP Policy 12. SDP Policy 7 requires development not to undermine Green Belt objectives. SDP Policy 12 requires LDPs to define green belt boundaries ensuring that strategic growth requirements are met. Some green belt land may be needed to meet housing requirements.	Not required in this instance
J2	313, 538, 525, 458	SESplan should establish the need for the Green Belt and whether it should be retained or released and undertake a broad review of its area. Continued erosion will lose all control.	The approved SDP sets out Green Belt policies. A study of the Green Belt was undertaken in 2008 to inform the SDP. SDP Policy 12 requires LDPs to define green belt boundaries ensuring that strategic growth requirements are met. Some green belt land may be needed to meet housing requirements.	Not required in this instance
J3	324, 357, 585	The Green Belt prevents urban sprawl.	This is acknowledged but not stated in Scottish Planning Policy. They maintain the landscape setting of settlements and help direct planned growth to the most appropriate locations.	Not required in this instance
J4	235, 293, 488, 691, 96	The figures would lead to unacceptable pressures on the Green Belt and impact on biodiversity.	SDP Policy 7 requires development not to undermine Green Belt objectives.	Not required in this instance
J5	447, 529, 441	Green Belt and landscape concerns are outweighed by the need to meet housing need where it arises.	This statements is not consistent with SPP and the approved SESplan SDP. SDP Policy 7 requires development not to undermine Green Belt objectives.	Not required in this instance
J6	299, 419	The Scottish Government should be clearer about protecting or developing Green Belt.	This comments will be forwarded to the Scottish Government	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
J7	84, 85	Suitable Green Belt opportunities must be taken up in Edinburgh and Midlothian in association with existing and potential public transport availability.	The development of the SDAs will involve long planned green belt releases to support development in accessible locations.	Not required in this instance
J8	438	Contradiction between prioritising brownfield and level of Green Belt development.	LDPs are required to prioritise deliverable brownfield sites before requiring greenfield allocations.	Not required in this instance
J9	489	Acknowledge there may be a need to build upon Green Belt land but concerned at the extent to which this is taking place.	The development of the SDAs will involve long planned green belt releases to support development in accessible locations.	Not required in this instance
J10	566	Further justification for Green Belt release must be provided.	SDP Policy 7 requires development not to undermine Green Belt objectives.	Not required in this instance
J11	309	It is entirely appropriate at the point in the Development Plan cycle where strategic and local policy is under review to undertake a more radical review of Green Belt boundaries.	The approved SDP sets out Green Belt polices. A study of the Green Belt was undertaken in 2008 to inform the SDP. Both the SDP and the Supplementary Guidance do not support continued erosion of the Green Belt.	Not required in this instance
<b>K - Housing Needs and Demand Assessment / Housing Market Area Assessment</b>				
K1	232, 237, 10, 418, 128, 407, 384, 249, 573, 350	Question the projections and the need and demand figures.	The Housing Need and Demand Assessment (HNDA) was approved as robust and credible by the Centre for Housing Market Research (CHMA). The requirement to meet the overall housing need figures was a requirement of the Scottish Government.	Not required in this instance
K2	519, 528, 530, 541, 517	The strategy should follow the Housing Market Area Assessment evidence redistributing 19% of Edinburgh's need and demand to East Lothian first followed by West Lothian, Midlothian and then Fife.	The setting of a housing requirement meeting housing need is more complex than an analysis of past private housing sales. For the SDP the whole of SESplan was regarded as a single housing market area. The suggested approach also do not take account of opportunities and constraints and capacities relating to the environment and infrastructure. The supplementary guidance balances the principle of seeking to meet need and demand where it arises with the capacity and constraints analysis and market and deliverability considerations whilst, aiming to achieve wider policy and strategy goals. It should be noted that 4,000 of Midlothian's housing requirement will be delivered in the South East Edinburgh SDA.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
K3	507, 224	The strategy should start from a point of asking whether the pattern of demand in the Housing Need and Demand Assessment can be met.	For the SDP the whole of SESplan was regarded as a single housing market area. The supplementary guidance balances the principle of seeking to meet need and demand where it arises with the capacity and constraints analysis and market and deliverability considerations whilst, aiming to achieve wider policy and strategy goals. As set out in approved SDP, Edinburgh cannot fully meet all the housing need and demand that arises there within its LDP boundaries. It should be noted that 4,000 of Midlothian's housing requirement will be delivered in the South East Edinburgh SDA.	Not required in this instance
K4	104, 329	Question whether there is a market for the level of housing. There is no evidence to suggest that 29,500 houses are needed in Edinburgh.	The HNDA was approved as robust and credible by the CHMA. The requirement to meet the overall housing need figures was a requirement of the Scottish Government.	Not required in this instance
K5	577	The figures are based on GRO estimates which are themselves based on estimates and trends and take no account of the economic situation.	The HNDA was approved as robust and credible by the CHMA. The requirement to meet the overall housing need figures was a requirement of the Scottish Government.	Not required in this instance
<b>L - Infrastructure</b>				
L1	134, 135, 445, 311, 312, 165, 474, 117, 368, 500, 557, 511, 319	Need for greater infrastructure investment from public sector and Scottish Government and involving the use innovative funding solutions.	Investigations into infrastructure delivery and funding are underway with public and private sector involvement. The comments will be passed onto the Scottish Government.	Not required in this instance
L2	374, 445, 311, 447, 283, 88, 368, 511	Plans must be realistic regarding developer funded infrastructure	This is acknowledged.	Not required in this instance
L3	411, 116, 88	Infrastructure before development	Infrastructure will be phased appropriately to be delivered when required.	Not required in this instance
L4	264, 557	Infrastructure requirements to be phased for when required.	Infrastructure will be phased appropriately to be delivered when required.	Not required in this instance
L5	84, 85	There must be grade separation at Sheriffhall junction and improvements at Old Craighall junction.	Studies are being undertaken to identify interventions and costs for these junctions.	Not required in this instance



Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
L6	557	Education and transport are the key constraints	This is acknowledged in the infrastructure assessment in the Technical Note.	Not required in this instance
L7	69	Infrastructure providers to be proactive	There is ongoing liaison with infrastructure providers, particularly focussing on funding the required infrastructure.	Not required in this instance
L8	257	Need for co-ordinated infrastructure review	Strategic infrastructure requirements for the SESplan area are set out in the Action Programme and will be reviewed as part of the process for preparing the next SDP. They will also be reviewed as part of LDP preparation. Further investigations into infrastructure delivery and funding are underway with public and private sector involvement.	Not required in this instance
L9	69	Education capacity should not prevent development	Development cannot be accommodated if the essential infrastructure requirements are not met.	Not required in this instance
L10	209	Paragraph 5.37 of the Technical Note and the reference to Transport Scotland is not understood. It is for the agency to carry out the necessary improvements.	Further investigations are underway into the funding of trunk road improves related to development.	Not required in this instance
L11	308	The Guidance needs to responsibly address the provision of strategic infrastructure.	Strategic infrastructure requirements for the SESplan area are set out in the Action Programme and will be reviewed as part of the process for preparing the next SDP. They will also be reviewed as part of LDP preparation. Further investigations into infrastructure delivery and funding are underway with public and private sector involvement.	Not required in this instance
L12	386	The Edinburgh LDP does not fully consider existing capacity issues at key junctions leading into Edinburgh.	The Edinburgh LDP is accompanied by a transport appraisal with mitigation measures identified through the LDP Action Programme.	Not required in this instance
L13	482	As the Capital City of Scotland, steps should be taken to remove barriers to development to prevent stagnation.	SESplan and partners wish to see the infrastructure barriers to economic growth and development removed. The SESplan response to NPF3 focussed on the issue of infrastructure provision to promote growth. Further investigations into infrastructure delivery and funding are underway with public and private sector involvement.	Not required in this instance
L14	434	Infrastructure constraints without support will lead to non-effective sites	Investigations into infrastructure delivery and funding are underway with public and private sector involvement.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
L15	139	Combining the West Edinburgh and Fife totals, the Forth Bridge and roads into the City cannot take the extra vehicles. It may be necessary to introduce tolls.	Whilst this is not a consideration for the Supplementary Guidance, the comments will be forwarded to Transport Scotland.	Not required in this instance
<b>M - Key Agency</b>				
M1	40, 44, 45	SNH cannot comment on need and demand.		Not required in this instance
M2	74, 75, 80	SEPA cannot comment until a Strategic Flood Risk Assessment has been undertaken. The re-assessment only considers Scottish Water infrastructure and not other issues related to water management. The impacts on ground and surface water within the South East Edinburgh SDA are of considerable concern.	Comments noted. However, the issues raised by SNH and SEPA are outside the remit of the Supplementary Guidance which focuses on setting a housing land requirement. The spatial strategy, design and flooding issues are addressed in the approved SDP. Work is underway on a Strategic Flood Risk Assessment for the SESplan area.	Not required in this instance
M3	266	Historic Scotland has no specific comments in relation to the actual breakdown and distribution of the additional allowances within or outwith SDAs. Would note the allocation of additional housing land increases the potential for impacts on the historic environment.	The SEA Environmental Report sets out a strategic assessment of the potential for impacts on the historic environment.	Not required in this instance
M4	171, 172, 173	Scottish Government are content with Table 3.1 subject to the responses to Questions 5 and 6 (Delivery) (Responses 174 and 175).	Noted.	Not required in this instance
M5	174, 175	Need to understand impacts on infrastructure, including cross boundary and cumulative.	Following the transport appraisal work on the SDP and Supplementary Guidance, further work is underway with Transport Scotland, SEStran and Member Authorities to further understand these impacts.	Not required in this instance
M6	174, 175	Spatial strategy is questionable without a clear mechanism for delivering and funding infrastructure	The Spatial Strategy is set out in the SDP which was approved by Scottish Ministers. Work is underway with Transport Scotland, SEStran and Member Authorities to further understand these impacts. All key parties, including the Scottish Government, will have a role in funding infrastructure in the SESplan region.	Not required in this instance
M7	47, 76, 79	SNH and SEPA wish to work with SESplan and member authorities to assist in the delivery of development.	Assistance from SNH and SEPA is acknowledged and welcomed.	Not required in this instance
M8	48	SNH support the design led approach.	This is welcomed as SESplan also support the design led approach. However, the Supplementary Guidance has a specific housing requirement remit.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
<b>N - Landscape Designations</b>				
N1	234, 294, 378, 348	Important landscapes should be protected.	Landscape designations were considered as part of the planning considerations in setting the Spatial Strategy in the approved SDP and in preparing the Supplementary Guidance.	Not required in this instance
<b>O - Paragraph 3.8</b>				
O1	13, 14, 20, 210	It is inappropriate of the Strategic Development Planning Authority to abdicate responsibility to LDPs.	The strategy is set out in the approved SDP. The Supplementary Guidance does not abdicate responsibility as development is directed towards the SDAs. Development outwith SDAs will be required to be in compliance with policy 7. The Supplementary Guidance meets the requirements of approved SDP Policy 5.	Not required in this instance
<b>P - Paragraph 3.9</b>				
P1	509, 366, 372, 508	Does not accord with SDP Policy 7 as amended by Ministers.	This is incorrect. Policy 7 relates to LDP and 5 Year Land Supply issues at LDP level.	Not required in this instance
<b>Q - Policy</b>				
Q1	300, 237, 488, 492, 493, 333, 324, 225, 419, 90, 137, 394, 321, 320, 343, 249, 487, 49, 425, 453, 349, 383, 398, 399, 573, 377, 380, 381, 382, 344, 241, 330, 50, 298	Delivery of the housing requirement on greenfield land / unsustainable locations will lead to outcomes opposite of the Government's and SESplan's sustainable goals and aims.	The Supplementary Guidance and the approved SDP have taken a balanced and considered approach. It acknowledges that housing need has to be met but this has to be informed by both the SDP and Scottish Government aims as well as infrastructure and environmental opportunities and constraints. The delivery of housing will contribute towards economic growth.	Not required in this instance
Q2	208, 369, 189, 193, 539, 433, 161, 164, 440, 529, 363, 495, 481, 540, 544, 288, 526	Non compliance with SPP - supply not directed to demand / delivery areas.	This is incorrect. The Supplementary Guidance has to achieve a careful balance of directing housing requirements to areas of deliverable housing demand as well as achieving wider policy goals and factoring in other consideration including housing need and infrastructure and environmental constraints, capacities and opportunities. No one consideration is given crowning importance over another.	Not required in this instance
Q3	519, 528, 523, 532, 536, 543	The methodology appears to identify the Additional Allowances first and then confirm a housing land requirement. This is contrary to SDP Policy 5 and SPP.	The methodology analyses the capacity of each area to accommodate further development. This is considered alongside the principle of meeting housing demand at origin and the environmental and infrastructure capacities and constraints assessments.	Clarify wording in section 5 and 6 of the technical note. This to clarify the methodology undertaken.

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
Q4	236, 310, 366, 372	Allocating Additional Allowances is a departure from the approved SDP which sets the 13 SDAs as the primary locations for development. This strategy is not properly justified.	The Supplementary Guidance does not allocate additional allowances. They are an indication of the level of additional supply required at present to meet requirements. Their scale is based upon capacity and suitability assessments undertaken by Member Authorities in conjunction with the SDPA.	Not required in this instance
Q5	260, 63, 469, 57, 112, 240, 242	Accords with Policy.	Noted.	Not required in this instance
Q6	67	Would wish to see the approach remain as in the draft document since currently the Outwith SDA requirements are referred to as suggestions and the levels described as indications. This approach is consistent with the flexibility requirements specifically SDP Policies 6 and 7, SPP and draft SPP.	Noted.	Not required in this instance
Q7	590	Table 3.2 is contrary to established planning policy in that it has allocated in excess of 20% of sites Outwith SDAs.	Identifying capacity outwith SDAs is in accords with the approved SDP. The Supplementary Guidance does not allocate sites for development.	Not required in this instance
Q8	229	SPP should allow for realistic plans.	Agree.	Not required in this instance
Q9	485	Use of windfall contrary to guidance.	This statement is incorrect. The use of a windfall allowance accords with approved SDP Policy 5.	Not required in this instance
Q10	517	Use of constrained land contrary to SDP and SPP.	It is a requirement of LDPs to re-assess land supply during LDP preparation. The land supply calculations were based on HLA 2012.	Not required in this instance
Q11	268	Requires presumption in favour of sustainable development.	This is not current policy.	Not required in this instance
Q12	307	Improve references to SPP on housing and Green Belt.	References to housing and green belt are set out the approved SDP.	Not required in this instance
Q13	517	Additional allowances 2019-2024 contrary to SPP.	The additional allowances set out in table 3.2 are an indication of the potential contribution that each SDA could make towards meeting the housing requirements. These figures will need to be re-assessed in LDPs to demonstrate that the requirements of SDP paragraph 113 have been met.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
Q14	208	Non compliance with SPP - requirement not linked to infrastructure delivery.	The requirement is linked to infrastructure delivery. Approved SDP Figure 2 and the Action Programme set out the strategic infrastructure required to support the strategy. Further detail will be contained in LDPs.	Not required in this instance
Q15	26	Role of SDPA to confirm compliance with SPP.	Noted.	Not required in this instance
Q16	43, 78, 82, 513, 576, 583	No comment on SPP compliance.	Noted.	Not required in this instance
Q17	103, 122, 339	Cannot confirm compliance until SPP review is complete	The Supplementary Guidance should comply with adopted Scottish Planning Policy not draft guidance. Due to required timescales, the timetable for the production of the Supplementary Guidance cannot be delayed to accommodate the review of SPP.	Not required in this instance
Q18	170	Accords with SPP subject to transport concerns being met.	Noted. Further work is underway to continue to address transport infrastructure delivery issues.	Not required in this instance
<b>R - Prime Agricultural Land</b>				
R1	32, 51, 234, 294, 327, 378, 489, 577, 33, 300, 488, 581, 322, 249, 96, 425, 479, 383, 377, 382, 330, 437, 585, 39, 272	Prime agricultural land should be protected / prevent loss.	Prime agricultural land was considered as part of the planning considerations in setting the Spatial Strategy in the approved SDP and in preparing the Supplementary Guidance.	Not required in this instance
R2	581	Need for the Scottish Government to set out how much Agricultural land to be retained.	This comment will be forwarded to the Scottish Government.	Not required in this instance
R3	478	Important to recognise the loss of agricultural land.	Prime agricultural land was considered as part of the planning considerations in setting the Spatial Strategy in the approved SDP and in preparing the Supplementary Guidance.	Not required in this instance
<b>S - Strategy</b>				
S1	463, 507, 519, 528, 429, 439, 179, 185, 191, 197, 369, 452, 527, 427, 282, 363, 495, 506, 215, 481, 517, 440	No justification to explain the distribution.	The reasoning for the distribution is set out in the accompanying Technical Note summarised in paragraphs 3.3 and 3.4 of the Supplementary Guidance. For clarity, this summary will be expanded in the Supplementary Guidance.	Expand the summary of justification of the distribution of the housing requirement in the Supplementary Guidance.
S2	373, 165, 166, 533, 535, 367, 506, 510, 511, 485, 545, 289, 440, 564, 303	Housing should be delivered to areas of demand and where housebuilders believe investment can be delivered.	The Supplementary Guidance and the approved SDP have taken a balanced and considered approach. It acknowledges that housing need has to be met but this has to be informed by both the SDP and Scottish Government aims as well as policy drivers and infrastructure and environmental opportunities and constraints.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
S3	430, 431, 548	The refresh of the assessment is selective, subjective, arbitrary and contradicts statements made in MIRs and Proposed LDPs.	This is incorrect. The refresh of the Spatial Strategy Assessment was agreed with Member Authorities. It is acknowledged that there is a typographical error in tables 8.17 and 8.19.	Not required in this instance
S4	431	It is not evident how the refresh has weighted economic and other benefits of delivery against environmental impact or how this is reflected in the distribution of the additional allocations.	Delivery of development and economic impact is not directly weighed against environmental impact. Setting a housing requirement requires more subtlety. Delivery considerations are required for all housing locations. The economic benefits of housing delivery is acknowledged.	Not required in this instance
S5	527, 164. 529, 510, 540, 517	Must be sustainable and not lead to commuting back to Edinburgh	The majority of the of the housing requirement identified will be located within Edinburgh or it's immediate hinterland. 4,000 dwellings of Midlothian's requirement will be developed in the South East Edinburgh SDA. Based on committed development a significant proportion of development will be located in accessible locations near Edinburgh in northern Midlothian, eastern West Lothian and western East Lothian. Sustainability is a balance of many, often competing considerations.	Not required in this instance
S6	507, 369, 506, 517, 440	The re-assessment of capacities and constraints is weak. The assessment of SAAs 9, 10, 11, 21, 22 and 23 is superficial.	The assessments are built on wider evidence set out in earlier tables in the appendices as well as LDP evidence base work.	Not required in this instance
S7	494, 223, 257	Will lead to piecemeal development not linked to infrastructure planning	A plan led system should prevent piecemeal development.	Not required in this instance
S8	84, 85, 444, 252	There must be recognition of capacity constraints relating to existing communities.	A capacities and constraints analysis was undertaken when preparing the Supplementary Guidance. LDPs will also undertake a similar local level analysis. It should be noted that new development can fund infrastructure and service improvement which increase capacities and remove constraints.	Not required in this instance
S9	441, 512	Plan is wedded to outdated ideas on brownfield, green belts, delivering housing and dispersal of housing.	Disagree. The approved SDP and Supplementary Guidance strikes an appropriate balance between the three elements of sustainable development to achieve SESplan and Scottish Government aims and objectives.	Not required in this instance
S10	501	Strategy justification should be brought into SG	The reasoning for the distribution is set out in the accompanying Technical Note summarised in paragraphs 3.3 and 3.4 of the Supplementary Guidance. For clarity, this summary will be expanded in the Supplementary Guidance.	Expand the summary of justification of the distribution of the housing requirement in the Supplementary Guidance.

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
S11	118	Moving housing need out of Edinburgh leads to large houses being built for commuting families which don't meet needs of communities.	Meeting strategic housing need acknowledges the movement of people away from their existing communities. The economic needs of Edinburgh are greater than it's capacity to house its requirements.	Not required in this instance
S12	527	Environmental constraints are exaggerated	Environmental considerations are given an appropriate weighting in line with SPP and the approved SDP. The SEA also informed the preparation of the Supplementary Guidance.	Not required in this instance
S13	512, 441	SDP lacks strategic vision	The Strategic Vision for the SDP was approved by Scottish Ministers.	Not required in this instance
S14	486	Resolve barriers and constraints rather than avoiding them	Where possible, measures are being explored and taken to overcome capacities and constraints. However, some environmental constraints cannot be overcome.	Not required in this instance
S15	435	Focus development away from Green Belt and Edinburgh and towards regional towns	Development must located in and near to Edinburgh to support the economy and reduce the need to travel.	Not required in this instance
S16	164	Need to acknowledge housing in growing economy	This is acknowledged.	Not required in this instance
<b>T - Table 3.1</b>				
T1	178, 184, 190, 196	The title of Table 3.1 is misleading.	Table 3.1 sets out the housing land requirement for each LDP area as required by SDP Policy 5. The title is in accordance with this.	Not required in this instance
T2	25	The table should breakdown the figures in the period 2024 - 2032 by authority.	This is not required by the approved SDP.	Not required in this instance
T3	27, 58, 65, 228, 243, 468	Agree with Table 3.1. The allocations are consistent with the numbers in the Scottish Ministers approval letter. Agree there is justification for this allocation.	Noted.	Not required in this instance
T4	551	The greatest challenge lies at the local level where sites for additional allowances must be found. Concur with the view that those authorities best placed, strategically to deliver additional housing take a proportion of the City's need and demand.	Noted.	Not required in this instance
<b>U - Table 3.2</b>				
U1	521, 531, 534, 542, 523, 532	Including these figures goes beyond what is required by SPP and SDP Policy 5. There is a risk these figures could be misinterpreted as housing land shortfalls.	The additional allowances set out in table 3.2 are for indicative purposes. These figures will need to be re-assessed in LDPs to demonstrate that the requirements of SDP paragraph 113 and the Supplementary Guidance.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
U2	15, 21	Table should be renamed 'Additional Requirement' to comply with SDP and SPP.	The table does not set out an additional requirement. It is the level of housing that is required, at present, in each SDA and outwith SDAs to meet the housing requirements in table 3.1.	Not required in this instance
U3	15, 21	The figures in table 3.2 are too low.	The figures are based on capacity assessment work undertaken in conjunction with the opportunities and constraints analysis. They will be re-assessed as part of LDP preparation.	Not required in this instance
U4	138, 102	Question the wisdom of Outwith SDA Allowances just in Edinburgh, Fife and the Scottish Borders. There are many small sites across the SESplan area which could contribute.	Development is to be focussed in SDAs where there is capacity that is consistent with the spatial strategy and aims of the SDP.	Not required in this instance
U5	21	There is no mechanism within the SDP that allows the separation of within and outwith SDAs.	This is set out in approved SDP paragraph 116 and Policy 7.	Not required in this instance
U6	532	Table 3.2 should be deleted.	Table 3.2 sets out the level of housing that is required, at present, in each SDA and outwith SDAs to meet the housing requirements in table 3.1. These will be re-assessed during LDP preparation. The table will not be deleted.	Not required in this instance
U7	495	Need for guidance on locations of development outside SDAs	Exact locations will not be set out. Policy 7 in the Approved SDP sets out criteria for the assessment of sites outside SDAs. The supplementary guidance cannot identify other SDAs or contradict the spatial strategy set out in the Approved SDP.	Not required in this instance
U8	115	The Allowances would be better defined as SDAs.	The allowances are an indication, at the present time, of the potential contribution each SDA could make towards the housing land requirement. They will be re-assessed during LDP preparation.	Not required in this instance
U9	28, 59, 66, 114, 131, 132, 227, 244, 415, 420, 442, 464, 86, 133, 218, 226, 245, 549	Agree with Table 3.2.	Noted.	Not required in this instance
U10	52, 140, 217, 304, 309, 340, 379, 404, 141, 147, 284, 305, 341, 362, 389, 405, 416, 424, 560	Does not agree with Table 3.2.	Table 3.2 sets out the level of housing that is required, at present, in each SDA and outwith SDAs to meet the housing requirements in table 3.1. These will be re-assessed during LDP preparation. The figures within the table were based on the assessments detailed in the Technical Note.	Not required in this instance



Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
<b>V - Windfall</b>				
V1	13, 19, 162, 168, 308, 14, 20, 163, 533, 544, 509, 531, 542, 167, 508, 532, 543	The figures are based on unsubstantiated assertions and overstated.	The figures are based on a through analysis of windfall trends in each member authority area. Policy 5 of the approved SDP allows for a justified allowance from windfall sites.	Not required in this instance

## Summary of Main Issues (Member Authority)

The full responses are available to view and download at -

<http://sesplan-consult.objective.co.uk/portal/sg/hsgland>

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
<b>W - City of Edinburgh</b>				
W1	104, 426, 123, 139, 233, 439, 148, 150, 428, 402, 565, 569, 202, 350, 437, 567, 124, 146, 231, 421, 422, 568, 359, 421	Cammo should not be included within West Edinburgh since it has no access to the tram, experiences severe traffic congestion and has infrastructure constraints (education and transport).	The exact boundaries and sites within the West Edinburgh Strategic Development Area (SDA) is a matter for the City of Edinburgh Local Development Plan.	Not required in this instance
W2	125	Question need for Cammo site given uncompleted sites across the city	There is an insufficient supply of existing sites to meet housing need requirements over the plan period.	Not required in this instance
W3	150, 571, 350, 437, 325	Development would affect setting and environment of Cammo estate	The exact boundaries and sites within the West Edinburgh SDA a is a matter for the City of Edinburgh LDP.	Not required in this instance
W4	411, 333, 324, 480, 336, 331, 90, 137, 169, 394, 322, 110, 321, 320, 343, 249, 96, 487, 49, 425, 453, 349, 91, 390, 241, 64, 337, 400, 355, 585, 296, 490	Balerno cannot accommodate new development due to infrastructure capacity issues (education and transport). The Lanark Road is congested.	The allocation of sites outwith SDAs is a matter for the City of Edinburgh LDP.	Not required in this instance
W5	333, 90, 336, 137, 320, 343, 391, 249, 487, 49, 425, 332, 241, 64, 328, 337, 355, 585	Balerno is not accessible to employment. Accessible areas in city should be developed instead.	Table 8.19 of the technical note identifies that South West Edinburgh is the 5th most accessible Strategic Assessment Area to employment in the entire SESplan Region.	Not required in this instance
W6	113, 162, 168, 261, 274, 364, 370, 408, 450, 496, 519, 528, 302, 164, 499, 483, 484, 454	The need and demand for housing is predominately generated by Edinburgh and should be accommodated there.	The majority of the housing requirement set out in the Supplementary Guidance will be provided in Edinburgh or its hinterland.	Not required in this instance
W7	527, 529, 363, 540, 517	No evidence of environment or infrastructure reasons why Edinburgh cannot meet need.	These are set out in the spatial strategy assessment tables in the Technical Note.	Not required in this instance
W8	234, 295, 403, 145, 204, 233, 250, 286, 297, 127, 406, 465	The figures for Edinburgh are too high.	Edinburgh is a source of both housing need and demand. Where environmental and infrastructure considerations allow and where consistent with the approved SDP, a generous supply of housing need should be met there.	Not required in this instance
W9	267, 450, 302, 269, 288, 451, 456, 572, 454	More land should be identified to the west of Edinburgh.	West Edinburgh is identified as an SDA in the approved SDP	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
W10	201, 444, 388, 443, 404, 389	The allocation of 2,700 dwellings in West Edinburgh should be removed or substantially reduced due to the potential impacts on traffic and education constraints.	West Edinburgh is identified as an SDA in the approved SDP. The exact level of housing allocated in the SDA will be set out the Edinburgh LDP. In the balance of considerations, which include infrastructure, West Edinburgh is considered a suitable and sustainable location for a strategic level of development.	Not required in this instance
W11	202	Solutions to accommodate growth in West Edinburgh will not be effective.	The solutions are being refined in the City of Edinburgh LDP and through work with Transport Scotland.	Not required in this instance
W12	105	The green belt around West Edinburgh should remain as it is.	SDP Policy 12 requires LDPs to define green belt boundaries ensuring that strategic growth requirements are met. Some green belt land in West Edinburgh may be needed to meet housing requirements.	Not required in this instance
W13	251	West Edinburgh bears a disproportionate share of proposed development.	The development of West Edinburgh is part of a long term strategy. It is not the largest Strategic Development Area set out in the SDP or compared to strategic sites in existing plans.	Not required in this instance
W14	203, 446	Garden District preferable to West Edinburgh	The Garden District is not a SDA and it is not within the remit of the Supplementray Guidance to identify further SDAs. Its suitability to meet housing requirements will be assessed in the Edinburgh LDP.	Not required in this instance
W15	535	Garden District more effective than diverting need to other authorities.	The Garden District is not a SDA and it is not within the remit of the Supplementray Guidance to identify further SDAs. Its suitability to meet housing requirements will be assessed in the Edinburgh LDP.	Not required in this instance
W16	261, 262	Further land within the South East and West Edinburgh SDAs requires to be considered for release along with further land within the North West and South West areas linked to transport corridors.	The Supplementary Guidance does not allocate or identify additional allowances to the North West and South West Edinburgh Spatial Assessment Areas. The South East and West Edinburgh SDAs have been identified as having further development potential in the Supplementary Guidance in table 3.2. Subject to the Edinburgh LDP and in compliance with SDP policy 7, land outside the SDAs can be identified for development. Analysis undertaken for the Supplementary Guidance, and set out in the Technical Note in section 5, indicates that there is capacity and potential for development in the North West Edinburgh and South West Edinburgh Spatial Assessment Areas.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
W17	236, 310	Allocating Additional Allowances within SAAs 9 and 11 is a departure from the approved SDP which sets the 13 SDAs as the primary locations for development. This strategy is not properly justified.	The Supplementary Guidance does not allocate or identify additional allowances to the North West and South West Edinburgh Spatial Assessment Areas. The South East and West Edinburgh SDAs have been identified as having further development potential in the Supplementary Guidance in table 3.2. Subject to the Edinburgh LDP and in compliance with SDP policy 7, land outside the SDAs can be identified for development. Analysis undertaken for the Supplementary Guidance, and set out in the Technical Note in section 5, indicates that there is capacity and potential for development in the North West Edinburgh and South West Edinburgh Spatial Assessment Areas.	Not required in this instance
W18	263	The allowances within North West and South West Edinburgh should be increased.	The Supplementary Guidance does not allocate or identify additional allowances to the North West and South West Edinburgh Spatial Assessment Areas. Whilst the review of environmental capacities and constraints and LDP analysis indicated that there is strategic potential in these locations, the Supplementary Guidance cannot identify these areas as SDAs. New housing in these areas is a matter for the Edinburgh LDP.	Not required in this instance
W19	388, 359, 432	The numbers for South East and West Edinburgh should be reduced.	These areas have been identified as having development capacity that can be accommodated sustainably to contribute towards meeting housing need. Both areas are identified as SDAs in the approved SDP.	Not required in this instance
W20	447, 164	South East Edinburgh is artificially constrained and this is not justified	South East Edinburgh will deliver significant levels of development. It is not being artificially constrained.	Not required in this instance
W21	30	South East Edinburgh road capacity insufficient.	Both the SDP and the Edinburgh LDP are accompanied by transport appraisals which consider road capacity.	Not required in this instance
W22	482, 483	Supportive of the identification of North West Edinburgh (SAA9).	Noted.	Not required in this instance
W23	395	South West Edinburgh is not suitable for strategic growth.	Table 8.19 of the technical identifies that it has potential to accommodate development on a strategic scale. The allocation of development in this area is a matter for the Edinburgh LDP.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
W24	521, 534, 523, 536	Recommend the addition of two SDAs - North West Edinburgh (1,000 homes) and South West Edinburgh (1,500 homes).	The Supplementary Guidance cannot identify further SDAs. The spatial strategy for SESplan is set out in the approved SDP. However, subject to the Edinburgh LDP and in compliance with SDP policy 7, land outside the SDAs can be identified for development. Analysis undertaken for the Supplementary Guidance, and set out in the Technical note in section 5, indicates that there is capacity and potential for development in the North West Edinburgh and South West Edinburgh Spatial Assessment Areas.	Not required in this instance
W25	267, 274, 308, 269	Flexibility should be added to allow for the significant amounts of housing at the Waterfront to come forward should the renewable energy development not proceed as planned. The contribution of Leith Docks needs to be clarified.	The focus is on delivering the approved strategy. If this situation occurs, alternative strategies will be analysed.	Not required in this instance
W26	11, 22, 547, 552	Flatted development at the Waterfront is not deliverable or marketable	Recent HLA information sets out that the waterfront will deliver during and beyond the plan period. The strategy in Edinburgh ensures that the strategy is not dependant on one location.	Not required in this instance
W27	211	The 2,500 Outwith SDAs is inappropriate.	It is in accordance with the approved SDP and is based on a capacity, opportunity and constraints assessment.	Not required in this instance
W28	29	Another SDA should be identified within Edinburgh to accommodate the 2,500 Outwith SDA Allowance.	The Supplementary Guidance cannot identify further SDAs. The spatial strategy for SESplan is set out in the approved SDP. However, subject to the Edinburgh LDP and in compliance with SDP policy 7, land outside the SDAs can be identified for development. Analysis undertaken for the Supplementary Guidance, and set out in the Technical note in section 5, indicates that there is capacity and potential for development in the North West Edinburgh and South West Edinburgh Spatial Assessment Areas.	Not required in this instance
W29	564	Edinburgh should seek deliver build for market rent properties.	Issue for exploration in the Edinburgh LDP and future housing market analysis.	Not required in this instance
W30	482	Further detail should be provided on the barriers and constraints to development in the Edinburgh City area.	Set out in the Technical Note, its appendices and the evidence base produced for the SDP and the Edinburgh LDP.	Not required in this instance
W31	31	Road improvements in and around Edinburgh required	This is acknowledged. The SDP and Action Programme sets out the strategic improvements that are required. More detail will be set out in the Edinburgh LDP and its accompanying Action Programme.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
W32	497, 498	On what basis has the reprogramming of Brownfield land within Edinburgh been undertaken.	In accordance with SPP and NPF3.	Not required in this instance
W33	232	Support some of CEC demand being met elsewhere	Noted.	Not required in this instance
W34	548	Further planned expansion of housing allocations is feasible and desirable in the City of Edinburgh area.	The housing requirement for Edinburgh is based on meeting need and demand whilst recognising the infrastructure and environmental capacities and constraints.	Not required in this instance
W35	126	Plans should improve Edinburgh	Development presents opportunities to make social, environment and economic improvements to an area.	Not required in this instance
<b>X - East Lothian</b>				
X1	602, 599, 600, 603, 152, 601, 604, 605, 606	Development of Goshen farm is not justified because of: infrastructure capacity, transport capacity, cultural and heritage impacts, sustainability, and environmental impacts. Other areas in East Lothian should be considered instead.	The sites within the East Lothian SDA is a matter for the East Lothian LDP. The comments have been forwarded to East Lothian Council.	Not required in this instance
X2	184, 196, 216, 555, 220, 551, 217	A greater proportion of Edinburgh's need and demand should be directed to East Lothian.	The East Lothian housing requirement recognises its role and position adjacent to Edinburgh.	Not required in this instance
X3	538, 215, 525	Additional capacity in East Lothian not explained / arbitrary.	The requirement of East Lothian was based on the assessment of constraints, capacities and opportunities as well as site capacity and identification work been undertaken for the East Lothian LDP. However, it is accepted that the <u>Technical Note could be clearer in this matter.</u>	Clarifications to sections 5 and 6 of the Technical Note for clarity is required.
X4	151	Consider sites in Western East Lothian that do not affect area around Wallyford.	The sites within the East Lothian SDA is a matter for the East Lothian LDP. The comments have been forwarded to East Lothian Council.	Not required in this instance
X5	35	East Lothian appears to have the capacity to take more as it is closely situated to Edinburgh where most people will take up employment.	The East Lothian housing requirement recognises its role and position adjacent to Edinburgh. The sites within the East Lothian SDA is a matter for the East Lothian LDP. The comments have been forwarded to East Lothian Council.	Not required in this instance
X6	596	North Berwick cannot accommodate further development without significant impact on infrastructure and the character of the place. New development should only be smaller homes for local people.	North Berwick is outside of the East Lothian SDA. The comments will be forwarded to East Lothian Council.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
X7	51, 9	East Lothian is a rural county which is in danger of becoming urbanised.	The SDP and Supplementary Guidance does not seek to urbanise rural areas. The exact location of housing within East Lothian is a matter for the East Lothian LDP.	Not required in this instance
X8	87	Infrastructure capacity and environmental constraints will restrict development	Constraints, capacities and opportunities were considered in setting the housing requirements for SESplan LDP areas.	Not required in this instance
X9	553	Goshen Farm is located within the East Lothian SDA and can accommodate 1,200 units.	The sites within the East Lothian SDA is a matter for the East Lothian LDP. The comments have been forwarded to East Lothian Council.	Not required in this instance
X10	287	Distribution of East Lothian's allocation should be made to other areas such as the Borders, Edinburghs villages and the west airport side.	The housing requirement sets an appropriate balance, to which East Lothian is required to contribute towards.	Not required in this instance
X11	83	The coastal strip has the most effective and faster public transport links and should be the focus of some allocations.	The coastal strip is not as accessible as other parts of East Lothian.	Not required in this instance
X12	253	East Lothian has already developed considerable housing in the period 2009 - 2019.	Further housing delivery will be required to meet the need for additional housing.	Not required in this instance
X13	465	Question the delivery of the East Lothian requirement	The requirement of East Lothian was based on the assessment of constraints and opportunities as well as site capacity and identification work been undertaken for the East Lothian LDP.	Not required in this instance
<b>Y - Fife</b>				
Y1	35, 274, 338, 345, 360, 514, 279, 352, 598, 502, 503, 516, 575, 276, 346, 353, 272, 574, 465	The figures for Fife are too high.	Fife is a source of both housing need and demand. The Fife requirement was based on the assessment of constraints, capacities and opportunities as well as site capacity and identification work been undertaken for the Fife LDP.	Not required in this instance
Y2	179, 185, 191, 197, 470, 180, 262	The Ore / Upper Leven Valley is not deliverable and should be deleted or reduced to not more than 1,220 units and the remainder added to the Outwith SDA allowance.	This would not be in accordance with the Spatial Strategy set out in the approved SDP. This is based on a long term regeneration strategy and not short term delivery issues.	Not required in this instance
Y3	273, 597, 153, 396, 354, 347, 335	Aberdour cannot accommodate more development without detrimental impacts to its character and infrastructure as well as increased traffic congestion.	The detail of individual sites within Fife is a matter for the Fife LDP.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
Y4	521, 534, 523, 536	Recommend the addition of a new SDA - The Fife Bridgehead. This would include towns such as Limekilns, Rosyth, North Queensferry, Inverkeithing and Dalgety Bay and include an allocation of 2,170 homes. This would be made up of 950 deducted from the Outwith SDAs Allowance and 1,220 deducted from the Ore / Upper Leven Valley SDA.	The Supplementary Guidance cannot identify additional SDAs. The approved spatial strategy is set out in the approved SDP. Development of the Ore/Upper Leven Valley based on a long term regeneration strategy.	Not required in this instance
Y5	184, 190, 196	A greater proportion of Edinburgh's need and demand should be directed to Fife.	This would not be considered sustainable.	Not required in this instance
Y6	366, 372, 392	The Outwith SDA allowance should be deleted.	It is in accordance with the approved SDP and is based on a capacity, opportunity and constraints assessment. The level of allowance will be reviewed during LDP preparation.	Not required in this instance
Y7	186, 192, 198	A significant proportion if not all of the additional 3,220 units proposed within the Ore / Upper Leven Valley should be for sites outwith SDAs.	This would not be in accordance with the Spatial Strategy set out in the Approved SDP. Development of the Ore/Upper Leven Valley based on a long term regeneration strategy.	Not required in this instance
Y8	354, 347	Lower the Fife requirement outside SDAs.	The allowance will be reviewed during LDP preparation in accordance with the SDP.	Not required in this instance
Y9	12, 37	Question delivery in Dunfermline.	This is based on the delivery of an approved strategy.	Not required in this instance
Y10	97	The figures for Fife have been artificially inflated by using the GRO estimates which are not based on reality and by accommodating Edinburgh's need and demand.	The Housing Need and Demand Assessment figures were considered as robust and credible by the Scottish Government.	Not required in this instance
Y11	98	It is for Fife to determine the breakdown by SDA in a manner that's open to public scrutiny.	The allowances will be reviewed during LDP preparation. The sites within SDAs is a matter for the Fife LDP.	Not required in this instance
Y12	262	A reduced allowance within the North Dunfermline SDA should be made due to deliverability concerns within the pre 2019 period.	The allowances will be reviewed during LDP preparation.	Not required in this instance
Y13	375	Fife will provide 43% of housing development outwith SDAs. This is extremely high. Query whether this is justified or proportionate.	The level of allowances will be reviewed during LDP preparation. The identification of areas outwith SDAs contributing towards meeting the housing requirements is in accords with the approved SDP.	Not required in this instance
Y14	548	Question whether Fife will be able to deliver.	The SDP and Supplementary Guidance focuses on delivering a long term strategy. The Housing Need and Demand Assessment indicates that there is a high level of housing need in Fife.	Not required in this instance



Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
Y15	36	There are other areas closer to the M90 that haven't been considered e.g. Kelty, Kinross and Southern Dunfermline. The North Dunfermline SDA is overtly biased to one area of Dunfermline.	The detail of individual sites within Fife is a matter for the Fife LDP.	Not required in this instance
Y16	471	Agrees with the identification of 1,950 units outwith SDAs provided this is justified in the HNDA. It will be important these are allocated on the right sites that are effective and deliverable.	The allowance will be reviewed during LDP preparation.	Not required in this instance
Y17	17, 18	Strategic villages such as Crossford to the west of Dunfermline could accommodate significant growth with no impact on the proposed green belt for Dunfermline. The Supplementray Guidance should specifically identify the Dunfermline Western Villages as a strategic location.	The spatial strategy is set out in the approved SDP. The supplementary Guidance cannot identify further SDAs. The detail of individual sites within Fife is a matter for the Fife LDP.	Not required in this instance
Y18	38	Vacant property and land in Dunfermline Town Centre should be developed.	The detail of individual sites within Fife is a matter for the Fife LDP.	Not required in this instance
Y19	280	Coastal villages should not be identified for new development.	Coastal Fife is not identified as part of a Strategic Development Area. The detail of individual sites within Fife is a matter for the Fife LDP.	Not required in this instance
Y20	594	Support for Fife Council's continued position on Dunfermline's expansion to the West, North and North West.	Noted.	Not required in this instance
<b>Z - Midlothian</b>				
Z1	130, 184, 190, 196, 261, 408, 93	The figures for Midlothian are too high.	The requirement for Midlothian is based on the continued delivery of an existing and approved long term delivery strategy. A strategic amount of Midlothian's requirement will be met within South East Edinburgh.	Not required in this instance
Z2	572	The additional allowances in the A7 / A68 / Borders Rail Corridor should be increased.	This level of development is considered appropriate. Further development in Midlothian at this time could not be accommodated and would impact on the delivery of the proposed strategy.	Not required in this instance
Z3	251, 316, 315	The A701 Corridor could accommodate far more development.	This level of development is considered appropriate. Further development in Midlothian at this time could not be accommodated and would impact on the delivery of the proposed strategy.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
Z4	317	Additional Allowances Outwith SDAs should be directed to the SDAs, in particular the A701 Corridor.	This level of development is considered appropriate. Further development in Midlothian at this time could not be accommodated and would impact on the delivery of the proposed strategy.	Not required in this instance
Z5	598	To much redistribution from CEC to MLC	A significant proportion of Midlothian's requirement will be delivered in the South East Edinburgh SDA. These sites will be accessible to employment and other major generators of travel within Edinburgh and Midlothian. This strategy is set out in the approved SDP and is recognised in NPF3.	Not required in this instance
Z6	212	Requirement not deliverable.	The requirement for Midlothian is based on the continued delivery of an existing and approved long term delivery strategy.	Not required in this instance
Z7	92	More thought required on transport in Midlothian to accommodate development.	Further work on cumulative transport impacts and mitigations is underway.	Not required in this instance
Z8	93	The number of houses allocated to Bilston is inappropriate.	The detail of individual sites within Midlothian is a matter for the Midlothian LDP.	Not required in this instance
Z9	318	Allowances within the A701 corridor are deliverable.	Acknowledged.	Not required in this instance
<b>AA - Scottish Borders</b>				
AA1	184, 190, 196, 261, 315, 533, 499, 544, 545	The Scottish Borders figures are too high/in excess of need and won't be delivered	Housing demand in the Scottish Borders will increase with the opening of the Borders railway allowing sustainable travel to Midlothian and Edinburgh. The Scottish Borders housing requirement reflects a long term strategy.	Not required in this instance
AA2	35, 338, 467, 473	Scottish Borders appears to be under distributed, especially with the new rail link.	Housing will be delivered in the Scottish Borders to build on the opportunities created by the Scottish Borders Railway.	Not required in this instance
AA3	530, 541, 598	It is flawed to rely on the Scottish Borders to such an extent.	The strategy does not 'rely' on the Scottish Borders. Only 12% of the overall SESplan housing requirement is allocated to the Scottish Borders.	Not required in this instance
AA4	84, 85	There should be a greater allocation in the Eastern Borders associated with a new station at or near Reston.	Although Reston Station has not yet been confirmed, there is a significant allocation of housing land with the Scottish Borders LDP.	Not required in this instance
AA5	230	The scale of new housing development in the Eastern Borders SDA should take into account Berwick-Upon-Tweed's local 'strategic' role. 900 additional houses are proposed in Berwick over the period to 2031.	The role and location of Berwick-upon-Tweed was recognised in the creation of the SESplan spatial strategy.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
AA6	607	The increased housing requirements affecting Peebles are excessive.	In the Supplementary Guidance the Western Borders SDA has an additional allowance of 110 units. The location within this SDA is a matter for the Scottish Borders LDP.	Not required in this instance
<b>AB - West Lothian</b>				
AB1	274, 212, 213, 586, 587	West Lothian could accommodate more housing.	The housing requirement for West Lothian is based on a balance of considerations, studies and analysis. This level of development is considered appropriate. Further development in West Lothian beyond current SDP requirements set out in the supplementary guidance could not be accommodated at this time and would impact on the delivery of the proposed strategy. It will be for the West Lothian LDP to determine the location of development to meet the requirements of the SDP.	Not required in this instance
AB2	32, 113, 130, 558, 33	The figures for West Lothian are too high.	The housing requirement for West Lothian is based on a balance of considerations, studies and analysis.	Not required in this instance
AB3	11, 22, 24, 23, 214	Winchburgh is a sustainable location and has capacity to accommodate more development.	Subject to the delivery of the rail station, the sustainability of Winchburgh is recognised. Details of sites within the West Lothian SDA is a matter for the West Lothian LDP.	Not required in this instance
AB4	552	There is a requirement for expansion in the Edinburgh / West Lothian corridor alongside public transport links.	The delivery of West Edinburgh and new development at Broxburn and Winchburgh is based around this strategy.	Not required in this instance
AB5	588	Despite the corridor through West Edinburgh into West Lothian being a primary economic driver for the region, the requirement assessed for West Lothian appears to be very conservative.	The requirement for West Lothian will require housing delivery that is in excess of achieved delivery rates seen in the 21st century. A significant level of this development will be delivered in eastern West Lothian.	Not required in this instance
AB6	209	It is not accepted that there are infrastructure constraints in West Lothian sufficient to downgrade its importance. Infrastructure is being provided in Winchburgh.	Winchburgh will contribute to meeting West Lothian's housing requirement. The detail of this is a matter for the West Lothian LDP. Constraints in West Lothian are set out in the appendices of the Technical Note.	Not required in this instance
AB7	558	The proportion of housing required from West Lothian is not supported by the availability of infrastructure.	A review of infrastructure constraints in West Lothian was undertaken during the preparation of this Supplementary Guidance. A full analysis of the requirements and a delivery strategy, including infrastructure provision, will be set out in the West Lothian LDP and its accompanying Action Programme.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
AB8	591	Development in west West Lothian is less deliverable	Detail of the individual sites within the West Lothian SDA is a matter for the West Lothian LDP.	Not required in this instance
AB9	563	Delivery of existing sites in West Lothian is unlikely within the plan period.	The delivery of existing sites will be reviewed in the preparation of the West Lothian LDP. The Supplementary Guidance is informed by Housing Land Audit 2012 agreed with the housebuilding industry and advises on proposed phasing of sites.	Not required in this instance
AB10	213	Review West Lothian infrastructure difficulties and promotes additional land release at Winchburgh.	A review of infrastructure constraints in West Lothian was undertaken during the preparation of this Supplementary Guidance. A full analysis of the requirements and a delivery strategy will be set out in the West Lothian LDP and its accompanying Action Programme. Detail of the individual sites within the West Lothian SDA is a matter for the West Lothian LDP.	Not required in this instance
AB11	589	Do not agree that West Lothian is in any way self contained. Concerned that sufficient housing to supply the Cross Plan requirement created by the Gyle, Airport, Newbridge, Livingston employment corridor has not been adequately addressed.	The requirement for West Lothian will require housing delivery that is in excess of achieved delivery rates seen in the 21st century. It will be for the West Lothian LDP to identify the sites for future development and infrastructure requirements to support development.	Not required in this instance

## Summary of Main Issues (Other)

The full responses are available to view and download at -

<http://sesplan-consult.objective.co.uk/portal/sg/hsgland>

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
<b>AC - No Further Comment</b>				
AC1	254	Question 3 - Nothing to add. See response 253.	No response required.	Not required in this instance
AC2	515	Question 3 - No specific opinion.	No response required.	Not required in this instance
AC3	255	Question 4 - Nothin to add. See response 253.	No response required.	Not required in this instance
AC4	554	Question 4 - No response.	No response required.	Not required in this instance
<b>AD - Duplicate Response</b>				
AD1	410	Duplicate response. See response 408.	No response required.	Not required in this instance
AD2	491	Duplicate response. See response 490.	No response required.	Not required in this instance

**APPENDIX C** Proposed Editorial Changes to the draft Supplementary Guidance on  
Housing Land

## Supplementary Guidance Housing Land – Proposed Editorial Changes

**Table A – Supplementary Guidance Proposed Editorial Changes**

Paragraph / Table Number	Existing Text	Proposed Editorial Change	Reason for Editorial Changes
2.2	“...a significant proportion of housing need and demand generated in the City of Edinburgh may need to be met in the other five LDP areas.”	“...a significant proportion of housing need and demand generated in the City of Edinburgh <del>may</del> <b>will</b> need to be met in the other five LDP areas.”	Removes uncertainty and is consistent with paragraph 110 of the SDP.
Table 3.2		Insert total row	Clarification of the scale of the additional allowances.
3.5	Replace paragraph	The distribution of the overall housing land requirement by LDP area builds on, and complements, existing committed development in accordance with the approved Spatial Strategy of the SDP. Capacity for development, that can be accommodated sustainably, has been identified where need arises and demand is found. This has had to take account of the analysis of the opportunities, constraints and capacities. This identified that there is insufficient sustainable capacity within the City of Edinburgh boundaries to meet a significant proportion of the demand for housing that arises there. Therefore, the shortfall has had to be made up in the other five LDP areas. This has either been located in areas closest to Edinburgh (e.g. Midlothian will deliver 4,000 units in the South East Edinburgh SDA) or to build on sustainable development opportunities, such as the opening of the Borders Railway. Full detail on how all the factors were considered in the Supplementary Guidance preparation process are set out in the accompanying Technical Note.	Additional reasoning and justification for the housing requirements set out in Table 3.1
3.11	In all circumstances, the principles and criteria set out within Policies 1B (Spatial Strategy Development Principles), 6 (Housing Land Flexibility) and 7 (Maintaining a Five Year Housing Land Supply) must be adhered to and met by each of the six LDPs.	In all circumstances, the principles and criteria set out within Policies 1B (Spatial Strategy Development Principles) and 6 (Housing Land Flexibility) must be adhered to and met by each of the six LDPs. Policy 7 (Maintaining a Five Year Housing Land Supply) enables LDPs to allocate sites outwith Strategic Development Areas, subject to satisfying the policy criteria.	Clarity in the Supplementary Guidance Document of the role of land outwith SDAs.

**Table B – Supplementary Guidance Technical Note Proposed Editorial Changes**

Paragraph / Table Number	Existing Text	Proposed Editorial Change	Reason for Editorial Change
Table 3.2		Remove footnote from table 3.2	Included as part of re-assessed land supply.
4.16	A step change in the level of housing completions by house builders will be required to deliver the HNDA requirement over the period 2009 - 2024.	A step change in the level of housing completions by house builders will be required to deliver the housing requirement over the period 2009 – 2024 (average of 7,180 dwellings per annum).	Additional text to give in context of the scale in increase of housing deliver required.
5.10	Following the refresh of the Spatial Strategy Assessment, each member authority determined that the total additional allowances (the phasing may have been amended).....	Following the refresh of the Spatial Strategy Assessment, each member authority determined that the <b>capacity that made up the total</b> additional allowances (the phasing may have been amended)....	Clarification that it was the capacity that was re-assessed.
5.13 Point 2	Additional text after “development sustainably.”	This is accordance with SDP paragraphs 113 and 116.	For clarification that the adopted SDP allows for LDPs to allocate land outwith SDAs.
5.14	Additional text at the end of the paragraph	Following the summary of the process for each LDP Area, a table shows the additional development capacity over the Established Land Supply. This includes the additional allowances previously set out in the Proposed SDP.	Clarifiaction of the process undertaken.
Table 5.3 Title	Additional Allowances in the City of Edinburgh	Additional Development Capacity in the City of Edinburgh	Correct definition of table
Table 5.4 Title	Additional Allowances in the East Lothian	Additional Development Capacity in East Lothian	Correct definition of table
Table 5.5 Title	Additional Allowances in the Fife	Additional Development Capacity in Fife	Correct definition of table
Table 5.6 Title	Additional Allowances in the Midlothian	Additional Development Capacity in Midlothian	Correct definition of table
Table 5.7 Title	Additional Allowances in the Scottish Borders	Additional Development Capacity in the Scottish Borders	Correct definition of table
Table 5.3 Title	Additional Allowances in the West Lothian	Additional Development Capacity in West Lothian	Correct definition of table
Paragraph 6.4	On the basis of the considerations above, Table 6.2 below sets out that the distribution of additional allowances by SDA to meet the shortfall of 24,338 units over the period to 2024.	On the basis of the considerations above, <b>and the capacity analysis undertaken in section 5</b> , Table 6.2 below sets out the distribution of additional allowances by SDA to meet the shortfall of 24,338 units over the period to 2024.	Clarification



Paragraph / Table Number	Existing Text	Proposed Editorial Change	Reason for Editorial Change
New Paragraph after 6.5		Firstly, the distribution of the Housing Land Requirement must be in accordance with the SESplan Spatial Strategy set out in the approved SDP. It builds on existing committed development, focussing further development along preferred corridors optimising connectivity and access to services and jobs.	Based on the content of some consultation responses, there is a need to remind that the Supplementary Guidance must accord with the approved spatial strategy.
Paragraph 6.8	In this context, it is proposed that requirements are set for each LDP which ensure that need and demand are met as far as practical in areas close to where that arises, taking into account the analyses outlined in section 6.	In this context, it is proposed that requirements are set for each LDP which ensure that need and demand are met as far as practical in areas close to where that arises, taking into account the analyses outlined in section 6 <b>5</b> .	Correction
Table 8.17	Recommended as Preferred Location for Development in Original Assessment - NO	Recommended as Preferred Location for Development in Original Assessment - <b>YES</b>	Correction
Table 8.19	Recommended as Preferred Location for Development in Original Assessment - NO	Recommended as Preferred Location for Development in Original Assessment - <b>YES</b>	Correction

**APPENDIX D**

Strategic Environmental Assessment Environmental Report

**SESplan Housing Supplementary Guidance**

**Strategic Environmental Assessment: Updated Environmental  
Report**

**February 2014**

**Contents**

Non-technical summary_____	3-6
1. Introduction	7-8
- Key Facts_____	7
- Consultation Authority comments_____	8
2. Planning context of the Housing Supplementary Guidance	9
- Relationship with other Plans, Policies and Strategies_____	9
3. Relevant aspects of the current state of the environment	10
- Baseline_____	11
- Likely evolution of the environment without the document_____	11
- Environmental objectives of the SEA_____	12-15
4. Assessment of environmental effects	16-20
- Alternatives_____	16
- Assessment findings_____	16-20
5. Measures to prevent/reduce/offset significant adverse effects_____	21-22
6. Monitoring_____	23
7. Next steps_____	23

### **Appendices**

<i>Appendix 1: Consultation Authority Comments_____</i>	<i>24-27</i>
<i>Appendix 2: Relevant Plans, Programmes and Strategies_____</i>	<i>28-52</i>
<i>Appendix 3: Detailed Assessments_____</i>	<i>53-70</i>
<i>Appendix 4: Battlefields (Addition to baseline)_____</i>	<i>71</i>

### **Annex 1**

Updated Environmental Report on SESplan Proposed Plan	
- Baseline_____	76-119

# **Non-technical Summary**

## **Background**

### ***Objectives***

- The Environmental Report contains an assessment of the additional and re-phased housing allocations that have been put forward in the SESplan Housing Supplementary Guidance (SG). This is the only objective of the document, as the SESplan strategic development plan has already been subject to the SEA process.
- The original SESplan SEA, which covers the same area in question in this SEA, contains a detailed environmental assessment that was considered useful to inform this SEA on the SG. In addition a background document that was undertaken separately, the Updated Spatial Strategy Assessment, also informs the assessment as elements of this work affect certain SEA topics.

### ***Contents***

- The Environmental Report contains:
  - o Key facts on the document
  - o Summary of the Consultation Authority comments on the Screening/Scoping statement
  - o Discussion of the relationship of the SG on relevant plans, policies and strategies (PPS)
  - o Discussion of relevant aspects of the Environment
  - o Assessment of the environmental effects of the SG and consideration of measures to prevent, reduce and offset these effects
  - o Consideration of monitoring
  - o Consideration of the next steps
- In addition to the contents above, an annex is contained which is the SESplan Updated Environmental Report. Importantly this document contains the baseline that was used.

### ***Relationship with other PPS***

- The table that was used for the SESplan SEA was updated for the SG as it was found a number of PPS had changed and that the more narrow scope of this document meant some PPS were not relevant.
- The findings resulted in useful indicators from respective PPS and these were used to establish SEA objectives.

## **Current state of the Environment and the evolution thereof without implementation of the plan or programme**

### ***Baseline***

- The baseline from the original SESplan was used to inform this Environmental Report on the SG, with support from the Consultation Authorities

- The baseline was a comprehensive representation on the respective elements of the SESplan environment that could be affected by the SG. It was split by relevant SEA topics.

***Likely evolution of the environment without the Housing Supplementary Guidance***

- It was considered that at a basic level additional housing numbers brought a negative impact on the environment of the area when compared to no additional housing numbers.
- However there were also benefits to be expected particularly for the population of the SESplan area through a greater choice of affordable housing, type of housing and access to additional open space

***Environmental characteristics of areas likely to be significantly affected***

- It was considered the baseline contained in the Annex provided this information

***Existing environmental problems which are relevant to the plan or programme***

- The baseline and relevant PPS, as well as the original SESplan Environmental Report and the Updated SSA confirmed that air quality, increased emissions, development on greenfield land, impact on cultural heritage, soil sealing, access to sustainable transport and flood risk were all potential environmental problems within the SESplan area that could be created or exacerbated by the Housing SG

***Environmental protection objectives, established at international, community or member state level***

- As stated above, the assessment of the relevant PPS resulted in indicators that were used to inform SEA objectives. Some of these indicators resulted from international legislation i.e. legislation on European Sites and priority species.

**Likely Significant Effects of the SG on the environment**

- The assessment of each member Local Authority area by SEA topic resulted in a range of findings, from minor negative impacts, neutral impacts, positive impacts and significantly positive impacts
  - o Air- it was found there may be negative effects in certain Local Authority areas due to increased traffic volumes which would have an adverse effect on air quality
  - o Climatic Factors- it was found there may be negative effects as a result of construction and from increased traffic volumes, due to increased emissions
  - o Population and Human Health- it was found there were positive impacts due to close proximity to sustainable transport links, greater

choice of types of housing, increased numbers of affordable housing and the potential for regeneration

- Soil- it was found there would be negative effects due to development of greenfield and prime agricultural land which could lead to soil sealing.
- The above effects were generally considered to be short through to long term, as the first phase of the additional allocations was 2009-2019, then impacts could begin to be experienced as soon as allocations began to be developed;
- It was thought the effects would be a mix of temporary and permanent. Construction emissions were considered to be temporary, whereas soil sealing could be permanent;
- Secondary effects were identified on the Climatic Factors and Water SEA topics, this resulted from rises in car usage exacerbating CO<sub>2</sub> emissions and soil sealing from development of greenfield land exacerbating flood risk.
- Cumulative effects were identified on the Air and Soil SEA topics. For Air this related to a cumulative negative impact on air quality in specific locations in the SESplan area, routes into and surrounding Edinburgh were considered to be at particular risk. For Soil it was assessed that the development of additional allocations on greenfield land might result in an overall negative effect on soil quality in the SESplan area.
- Synergistic effects- One such effect was identified on the Population & Human Health SEA topic; it was found that the combination of air pollution and rise of CO<sub>2</sub> emissions could have an impact on human health issues.

**Measures to prevent, reduce & as fully as possible offset any significant adverse effects on the environment of implementing the plan**

- Measures to tackle the possible adverse effects identified above were identified:
  - For Air the assessments were either neutral or minor negative. The assessment centred on increased emissions from both increased number of motorised journeys and construction. It was decided that some local authorities have the public and sustainable transport links to be able to significantly mitigate emissions from motorised journeys, whereas other local authorities do not. However continued development of better public and sustainable transport links, including the CSGN, and encouragement of modal shift will make an impact across the SESPlan area.
  - For Climatic Factors the assessment mainly concluded that the effects were unknown. It could be established that development would avoid coastlines, and therefore associated impacts. However with requirements being located out of SDAs, and with limited brownfield land available, effects associated with development on greenfield land, such as soil erosion and soil sealing are possible. Work will be required at LDP level to allocate the requirement to the most appropriate land and to provide effective mitigation of issues identified.

- For Cultural Heritage the results of the assessment were mainly unknown, this was because of the large number of cultural heritage assets in the respective local authority areas or their SDAs. It could be established that impacts were almost certain but it could not be asserted whether they would be negative or positive. It was considered that a design-led approach, particularly to promote “distinctive” places could help mitigate any adverse effects by considering the cultural heritage asset from an early stage.
- For the Landscape and Townscape SEA topic it was judged that the Updated SSA would generally help to ensure no negative effects on landscape designations, although a minor negative effect is expected in the West Edinburgh SDA. In addition to this, it was considered that the promotion of additional allocations at a LDP level should be through a ‘design-led’ approach to help ensure the creation of successful places; by doing this it is considered the setting and character of the respective towns and landscapes would be taken account of.
- For the Soil SEA topic it was judged that at a LDP level brownfield sites should be primarily considered for allocations where possible, although it is found that this is not possible in certain local authority areas. In addition, measures to reduce the impact of soil sealing and soil erosion should be considered wherever possible, such as permeable surfaces, SUDs design and green infrastructure. The loss of prime agricultural land will require monitoring to avoid impacts associated with climate change and food security in future years.

**Description of the measures envisaged concerning monitoring in accordance with section 19**

- It is stated that the SG is essentially an extension of the SESplan document and that it is unclear whether there would be another document of this type or whether the document will be superseded by SESplan Strategic Development Plan (SDP) 2.
- As a result the most effective way to monitor the effects identified in this document is considered to be to ‘piggy-back’ on the Monitoring Report for SESplan and ensure that in the future these issues are built into the next SEA that is undertaken for SESplan SDP 2 or are built into the SDP 2 itself.



## **1. Introduction**

1.1 The purpose of this Environmental Report is to:

- provide information on the SESplan Housing Supplementary Guidance
- identify, describe and evaluate the likely significant effects of the SG and its reasonable alternatives (if any are identified)
- provide an effective opportunity for further comment from the Consultation Authorities, and for the public to offer any views on any aspect of this Environmental Report.

1.2 The key facts relating to the SESplan Housing Supplementary Guidance are set out in Table 1 below:

<b>Name of Responsible Authority</b>	<b>SESplan</b>
Title	SESplan Housing Supplementary Guidance
What prompted the document?	Scottish Ministers
Subject	Land use planning/housing
Period covered by the document	2009-2024
Frequency of updates	The document will be superceded by SESplan SDP 2
Area covered by the document	The entire SESplan area; covers entire Local Authority areas of City of Edinburgh, East Lothian, Midlothian, Scottish Borders and West Lothian, and the southern part of Fife, including the settlements Glenrothes, Dunfermline & Kirkcaldy
Purpose of the document	The SG sets out how much of the overall housing land requirement should be met in each of the 6 member authority areas for the period 2009-2024. In addition to this it also presents a revised phasing of the intended implementation of these housing figures.
Contact Point	Philip.graham@scotborders.gov.uk

1.3 This Environmental Report refers to work that was undertaken in the SEA for SESplan, as a result Table 2, below, shows the previous SEA milestones that have been reached. Alongside this information the stage that SESplan and the subsequent supplementary guidance have reached are also included, this is because the SG is additional guidance which hangs off the approved SESplan SDP1. The requirement for the SG arose out of the examination of SDP 1.

*Table 2 Milestones of SESplan and associated SEA*

	<i>SESplan</i>	<i>SEA</i>
TIME ↓		Main Issues Report (MIR): Scoping Report
	MIR	MIR Environmental Report
	Proposed Plan	Addendum to Environmental Report
	<b>Examination and subsequent Reporter's recommendations accepted by Scottish Ministers</b>	
	SESplan SDP 1 Adoption Statement	
		Draft SESplan SG on Housing: Screening and Scoping Report
	<b>Consultation Authority comments</b>	
	Draft SESplan SG on Housing	Environmental Report
	Consultation	Consultation
	Approval	
		Post Adoption Statement

### Consultation Authority Comments

- 1.4 A Screening/Scoping report was prepared which set out the proposed content of the Environmental Report and the proposed methodology for the completion of the environmental assessment in the Environmental Report. This report was sent to the Consultation Authorities via the SEA Gateway on 13 August 2013 and 3 responses (Historic Scotland, SEPA, SNH) were received on 10 September 2013.
- 1.5 Where appropriate the responses have been used to inform this Environmental Report. Appendix 1 below contains a matrix which summarises the representation received and provides a response, which details the action that was taken as a result.

## **2 Planning Context of the Housing Supplementary Guidance**

### **Outline & objectives of Draft Housing Supplementary Guidance**

- 2.1 The purpose of the SG is to provide detailed further information in support of SDP Policy 5 (Housing Land). The further information will provide direction for Local Development Plans (LDPs) as to how much of the overall housing land requirement should be met in each of the six member authority areas (City of Edinburgh, East Lothian, Fife, Midlothian, Scottish Borders and West Lothian)
- 2.2 The document will essentially act as an addition to the SESplan document and, as part of the hierarchy of development planning; Local Development Plans for SESplan member authorities will be required to take cognisance of the findings.
- 2.3 As a result, the document is relatively short, as it only has to present one key objective. However there is a Technical Note which shows how the findings that are presented were concluded. As a part of this Technical Note there is an update to a Spatial Strategy Assessment (SSA) which was undertaken for the original SESplan.
- 2.4 The original SSA was undertaken to help decide upon Strategic Development Areas (SDA); these areas were allocated through an assessment of a number of criteria with the overall aim to try to find the most sustainable locations for prospective housing allocations in the respective Local Authority areas. The first stage of the assessment process was to sieve out areas not suitable for strategic development taking account of national and international environmental designations and accessibility analysis. The remaining land was divided into 30 sub-areas which were assessed against a range of criteria including environmental considerations.
- 2.5 The update to the SSA follows a similar methodology. In effect the SSA complements the Environmental Report, in explaining the environmental effects of the preferred housing areas across the respective Local Authorities and the areas deemed non-preferable. The Environmental Report then adds detailed environmental assessment of these areas against the SEA criteria detailed in the Environmental Assessment Act.

### **Relationship with other Plans, Programmes & Strategies (PPS)**

- 2.6 Appendix 2 contains a table which lists PPS and a summary of their content; these are split by SEA topic. These PPS are considered to have relevant detail which the SG should take cognisance of. A further column is provided which shows the SEA topics that are affected, as it is found that certain PPS affect more than one SEA topic.
- 2.7 By identifying these PPS and their relevant content, indicators to protect the SESplan environment, including its residents, is established and this can be used in the detailed assessment of the content of the SG. It is considered that some of the indicators are more important than others, or one indicator may cover a number of separate issues (i.e. protection of natural heritage assets can include key habitats and species and forestry), therefore further work is done in Table 3 below, to refine these indicators to help streamline the assessment:

Table 3: Indicators from respective SEA Topics for the detailed assessment	
Air	<ul style="list-style-type: none"> <li>• Do not exacerbate or create new Air Quality Management Areas</li> <li>• Aim to allocate housing land accessible to sustainable and public transport</li> </ul>
Biodiversity, flora & fauna	<ul style="list-style-type: none"> <li>• Avoid allocating land where the natural heritage assets of the SESplan area may be adversely affected</li> </ul>
Climatic Factors	<ul style="list-style-type: none"> <li>• Consider the potential for climate change mitigation and adaptation in the allocation of housing land</li> </ul>
Cultural Heritage	<ul style="list-style-type: none"> <li>• Avoid adverse impacts on the site and setting of historic environment assets within the SESplan area</li> </ul>
Landscape & Townscape	<ul style="list-style-type: none"> <li>• Ensure allocations 'fit' within the landscape by following national design guidance</li> <li>• Avoid adverse impacts on the designated landscapes of the SESplan area</li> </ul>
Water	<ul style="list-style-type: none"> <li>• Avoid creation and exacerbation of flood risk in the allocation of housing land</li> <li>• Avoid adverse impacts on water bodies from the allocation of housing land</li> </ul>
Population and Human Health	<ul style="list-style-type: none"> <li>• Aim to ensure housing land is accessible to usable open space, and sustainable transport routes, including integrating with the CSGN and Borders Green Network</li> </ul>
Material Assets	<ul style="list-style-type: none"> <li>• Ensure allocations are accessible to waste management facilities</li> <li>• Consider the potential for renewable energy and heat generation in the allocation of housing land</li> </ul>
Soil	<ul style="list-style-type: none"> <li>• Adhere to contaminated land regulations in the allocation of housing land</li> <li>• Aim to avoid soil erosion and soil sealing where allocations are located</li> </ul>

### **3 Relevant aspects of the current state of the environment**

#### **Environmental baseline data**

3.1 The SESplan SEA was undertaken using a comprehensive baseline which was then updated at the end of 2011 for the Updated Environmental Report. Table 4 below shows the environmental information that was used to form this baseline:

<b>SEA Topic</b>	<b>Corresponding spatial information</b>
Air	Air quality and average daily vehicle flows
Biodiversity	Special Areas of Conservation, Special Protection Areas, Ramsar sites, Sites of Special Scientific Interest and Ancient Woodland Inventory
Climatic Factors	Flooding, air quality, wind turbines & CO <sub>2</sub> emissions
Cultural heritage	Scheduled Ancient Monuments, Listed Buildings, World Heritage Sites and Gardens & Designed Landscapes Inventory
Landscape	National Scenic Areas, Areas of Great Landscape Value and Country Parks
Material assets	Current land use
Population & Human Heath	Green network, key transport routes (road & rail), Core Paths, Urban Areas and SUStran routes
Soil	Vacant & Derelict Land Survey
Water	SEPA flooding data

3.2 It is considered that given the SG applies to the entire SESplan area and it was compiled relatively recently that it can be re-used for this Environmental Report. An addition is made to incorporate the recently designated battlefield sites located within the SESplan area.

3.3 The baseline is presented at Annex 1; it consists of text based evidence backed by relevant spatial maps, which are split by SEA topic.

#### **Likely Evolution of the Environment without the Housing Supplementary Guidance**

3.4 The SESplan SEA states that SESplan has a statutory obligation to set a vision for the South East Scotland area, to consider development alongside other issues such as the principal social, economic, physical and environmental characteristics of the area and infrastructure provision and use and address the

strategic and cross boundary planning issues in South East Scotland. In addition SESplan must contribute to sustainable development.

- 3.5 The SG has a revised phasing of housing requirement to that included in the Proposed Plan for SDP1. Therefore, the impacts on the environment of the Supplementary Guidance in comparison with the housing distribution set out in the Proposed Plan are likely to be increased. The development of a revised phasing of housing will lead to additional environmental impacts in comparison to those set out in the Environmental Report for SDP1.

### **Environmental Objectives of SEA**

- 3.6 The SESplan SEA uses the findings of the current state of the environment to articulate a number of SEA objectives and sub-objectives which form a basis against which assessment of the SESplan proposals can occur.
- 3.7 It is considered that these objectives and sub-objectives are also relevant to a degree for this Environmental Report's assessment of the SG. However it is also pertinent to look at the information the revised relationships from the PPS provides to establish if there should be any change. In addition, it is also necessary to decide on whether the SEA objectives previously identified are still appropriate given the context of the SG.
- 3.8 An indication is also provided of what monitoring is appropriate for each SEA objective identified, where this is known.
- 3.9 As a result the following SEA objectives and monitoring measures are decided upon, shown in Table 5:

Table 5 SEA Objectives			
SEA Objective	SEA Topic	Sub-objectives	Monitoring
To sustain current air quality levels	Air	<ul style="list-style-type: none"> <li>• Maintain current levels of air quality</li> <li>• Provide greater opportunities for access to sustainable forms of transport</li> </ul>	<ul style="list-style-type: none"> <li>• Current air quality</li> <li>• Average daily vehicle flows</li> <li>• SEStran mode share targets and region wide measures (environmentally sustainable measures)</li> </ul>
To avoid adverse effects on natural heritage assets of the SESplan area as a result of the location of additional or re-phased allocations	Biodiversity	<ul style="list-style-type: none"> <li>• Protect international conservation areas</li> <li>• Protect national/local conservation areas</li> <li>• Protect ancient woodland</li> <li>• Protect/enhance the Green Network.</li> </ul>	<ul style="list-style-type: none"> <li>• Ancient woodland extent</li> <li>• Forest cover as stated in the Native Woodland Survey of Scotland</li> <li>• CSGN work plan, Milestones to 2016 'A place for Nature'</li> <li>• Local biodiversity and geodiversity site (LBS and LGS) monitoring</li> <li>• Monitoring of developments involving woodland loss</li> </ul>
To minimise CO <sub>2</sub> emissions as a result of location of additional or re-phased allocations	Climatic Factors	<ul style="list-style-type: none"> <li>• Promote development in areas accessible by public transport</li> <li>• Promote the potential for renewable energy and heat generation from areas allocated for housing</li> </ul>	<ul style="list-style-type: none"> <li>• Current CO<sub>2</sub> emissions for domestic gas &amp; electricity</li> <li>• Current CO<sub>2</sub> emissions for transport</li> <li>• National renewable energy targets</li> <li>• SEStran mode share targets and region wide measures (environmentally sustainable measures)</li> </ul>
To safeguard the built and historic environment from impacts as a result of additional or re-phased allocations	Cultural heritage	<ul style="list-style-type: none"> <li>• Protect listed buildings</li> <li>• Protect scheduled monuments</li> <li>• Protect world heritage site</li> <li>• Protect designed gardens &amp; landscapes</li> </ul>	<ul style="list-style-type: none"> <li>• Number and outcome of planning applications with significant effects on - listed buildings; scheduled monuments; world heritage sites; designed gardens and landscapes; and buildings at risk</li> </ul>

To protect the landscape and townscape within the SESPlan area from impacts as a result of additional or re-phased allocations.	Landscape & Townscape	<ul style="list-style-type: none"> <li>• Protect designated sites</li> <li>• Protect settlement townscapes</li> </ul>	<ul style="list-style-type: none"> <li>• Local Authority landscape review documents</li> <li>• Local Authority conservation area statements</li> </ul>
To ensure sustainable location of additional or re-phased allocations regarding necessary infrastructure	Material assets	<ul style="list-style-type: none"> <li>• Sustainable use of mineral resources</li> <li>• Recycling of waste</li> </ul>	<ul style="list-style-type: none"> <li>• Current mineral resources available</li> <li>• % of waste recycled</li> </ul>
To improve the quality of life and human health for communities in the SESplan area	Population & Human Health	<ul style="list-style-type: none"> <li>• Provide access to employment</li> <li>• Provide affordable housing</li> <li>• Improve access to services</li> <li>• Provide access to greenspace</li> <li>• Access to footpaths &amp; cycle routes</li> </ul>	<ul style="list-style-type: none"> <li>• Employment statistics/employment sites data</li> <li>• Public transport provision &amp; cycle networks</li> <li>• % of affordable housing available</li> <li>• Accessibility to services</li> <li>• Accessibility to designated green network and/or open space</li> </ul>
To minimise the impact on soil quality from impacts as a result of additional or re-phased allocations, and to adhere to contaminated land regulations	Soil	<ul style="list-style-type: none"> <li>• Identify areas of expansion on brownfield land</li> <li>• Protect soil quality</li> </ul>	<ul style="list-style-type: none"> <li>• Vacant &amp; derelict Land Surveys</li> <li>• Urban Capacity Studies</li> <li>• Areas of contaminated land</li> <li>• Land capable for agriculture classification maps</li> <li>• Peat rich soil maps</li> </ul>



<p>To avoid creation of flood risk and adverse significant effects on water bodies from impacts as a result of additional or re-phased allocations</p>	<p>Water</p>	<ul style="list-style-type: none"> <li>• Protect and enhance quality of watercourses in line with RBMP objectives</li> <li>• Identify areas of expansion away from flooding areas</li> <li>• Improve existing water/waste water infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>• Status of major water courses</li> <li>• Location of flooding</li> <li>• Existing water/waste water infrastructure</li> </ul>
--	--------------	---	--

## **4 Assessment of environmental effects**

### **Alternatives**

- 4.1 As stated in the Screening and Scoping Statement alternatives have not been considered for the SG. Due to the fact that there is a significant volume of background work in the SESplan SEA and the SSA on identifying sustainable areas for housing land and avoiding likely significant effects on the environment and the SG only adds to this work, it is not necessary to consider alternatives.
- 4.2 In addition the SSA has been updated as a part of the production of the SG and as a result this work provides an assessment underpinning the SG and negates the need to look at alternatives.

### **Assessment findings**

- 4.3 The matrix at Appendix 3 shows the detailed assessment of the increase in housing numbers as a result of the additional allowances and phasing changes by LDP area which are set out in the SG. These assessments set out the impacts of the increase in allowance compared to the Proposed Plan housing allowances per LDP area. Each Local Authority area change is assessed against the respective SEA topic and its SEA objective(s), a ranking is given and a text commentary is provided which justifies this ranking.
- 4.4 The findings of the detailed assessment are summarised in Table 6, and the paragraphs that follow provide a text commentary for each SEA topic.
- 4.5 A further matrix is produced to show the assessment of cumulative effects and there is also a text commentary elaborating on the findings.
- 4.6 There is discussion of any synergistic effects established.

Table 6 Summary of assessment findings									
Local Authority Area	Impact on SEA Topic								
	Key	xx	x	0		✓	✓✓		
		Major negative	Minor negative	Neutral		Minor Positive	Major Positive		
	Air	Biodiversity, fauna & flora	Climatic Factors	Cultural Heritage	Landscape & Townscape	Material Assets	Population & Human Health	Soil	Water
City of Edinburgh	0	0	?	0	x	0	✓	x	0
East Lothian	x	0	?	?	?	?	0	x	0
Fife	x	0	?	?	?	0	✓✓	0	0
Midlothian	0	0	x	0	0	0	✓	x	0
Scottish Borders	0	0	0	0	0	0	✓	0	0
West Lothian	0	0	?	?	0	0	✓✓	x	0

- Formatted: Font: Not Bold
- Formatted: Font: Not Bold
- Formatted: Font: Not Bold
- Formatted: Font: Not Bold
- Formatted: Font: Not Bold

## Air

4.7 The assessment of the Air topic largely centres on emissions from increased car journeys and the degree of significance that this will be the case versus development of public and sustainable transport links, the degree to which these measures help to mitigate increased emissions and the proximity of services, employment and other destinations to the SDAs and known or under development public and sustainable transport links. It is identified that where the additional housing requirement is a low value and there are good public transport and sustainable transport links, close to services, employment etc., then the assessment can reasonably be concluded as neutral.

4.8 In the Borders, the housing sites here are known precisely and as a part of the Proposed LDP SEA the sites have been assessed and no negative impact was identified. This was largely because the allocations are within settlements and are walking distance to town centres and links to the Borders Green Network. In Edinburgh it is considered that the measures being implemented in terms of public and sustainable transport links have the potential to significantly mitigate increased carbon emissions, and they are accessible to services, employment and other destinations, and therefore a neutral assessment is appropriate. In East Lothian and Fife, which are a further distance from Edinburgh, it is judged that the likelihood of increased car journeys is higher and that the public transport links are not as effective, especially as employment and services are located further away, therefore a minor negative impact is identified.

## **Biodiversity, flora & fauna**

4.9 The assessment is neutral across the Local Authority areas assessed. The Updated SSA ensures that additional land is located away from land important for biodiversity, and an HRA has concluded there will be no likely significant effects (LSE) on the site integrity of European Sites (subject to LDP level HRA). In addition, there will be some impacts on habitats from further use of greenfield land; however when the continued development of the CSGN<sub>1</sub> and open space associated with development is considered it is judged that the impacts will not result in negative impacts.

## **Climatic Factors**

4.10 Due to the fact that there are significant additional requirements out with SDA in Edinburgh and Fife, and there are also significant additional requirements in the East Lothian and West Lothian SDAs, which cover the entire area of these local authorities, the assessment in these areas is considered to be unknown. This is because it is only at LDP level where the precise location of the additional requirement will be known. It is possible in instances to assert that certain issues are more likely to be significant than others, for example where it is known development will be away from the coast. However conclusive environmental assessment will require to be done at LDP level. In Midlothian a minor negative impact is identified because of the risk of soil erosion from development on greenfield land.

## **Cultural Heritage**

4.11 The SESplan area has a large number of cultural heritage assets including Listed Buildings, Scheduled Monuments, Gardens and Designed Landscapes, Conservation Areas and a World Heritage Site. The assessment finds that almost all of the local authorities have a high degree of uncertainty on the significant effects that development of the additional requirement would bring on these respective assets, this is because, with the exception of the Borders, it is unclear precisely where or how the requirement proposed would be developed.

4.12 However it is considered that Policy 1B of the SESplan, 'Development Principles' prevents significant adverse impacts on the Cultural Heritage from LDPs allocating the housing requirement. In addition development of a design-led approach, particularly consideration of 'distinctive places' would likely build in assessment of the cultural heritage sites related to any particular housing sites. These two measures are considered to minimise the risk of negative impacts from the requirements identified in the SG, and as a result they also make a neutral assessment possible where there is greater detail available in terms of smaller SDAs or limited housing requirements. However, in larger SDAs or areas unknown, where little detail is provided, an unknown assessment has been considered appropriate.

## **Landscape & townscape**

4.13 It is considered that the level of greenfield land required in western parts of Edinburgh may result in a minor negative impact on the SEA topic. Due to the uncertainty in location of additional allocations in Fife and East Lothian it is not possible to give a defined assessment. It is thought that a design-led approach will help to mitigate impacts but this would need to be employed at the LDP level.

## **Material Assets**

4.14 In East Lothian the fact that the specific locations of the additional allocations are not identified means that a range of scenarios are possible and as such the assessment must be 'unknown'. In the majority of other member authority areas it is considered that the assessment is neutral. There is discussion of the possibility of the loss of land once used for mineral extractions, such as in Fife or West Lothian, however it is considered negative impacts are unlikely because LDP work will identify mineral resources that have potential and safeguard these from development; the SDAs have enough flexibility, due to their size, to allow development to be located away from these areas.

## **Population & human health**

4.15 The assessment findings are mainly positive. It was considered that significantly positive could be applied for all Local Authority areas, as was the case in the SESplan SEA; however the additional allocations raise the probability of housing being built in less sustainable parts of SDAs (particularly where they are outwith SDAs). However the significant majority of housing will remain within SDAs and there is additional benefits in terms of greater levels of affordable housing and tenure types. Where significant regeneration potential is identified in the Updated SSA then it is considered that this brings a significant positive effect when combined with the other factors, this is the case in Fife and West Lothian. However in East Lothian the positive benefits of the additional allocations may be checked by congestion on routes into Edinburgh and a lack of rail capacity.

## **Soil**

4.16 The majority of the assessments are minor negative. The original SESplan SEA found that there was the potential for minor negative impacts on the Soil SEA topic due to the fact that for certain Local Authority areas there would be substantial development on greenfield land and therefore there was potential for soil sealing. It is considered this assessment is still relevant to the additional allocations proposed in the SEA and the issue may be compounded. In the Borders and Fife it is considered that the respective lower levels of development and supply of brownfield land mean that a neutral impact is more likely. Mitigation measures discussed include the use of permeable construction methods, SUDS design and green infrastructure; however this would require support at LDP level.

## **Water**

4.17 The assessments for the Water SEA topic are all neutral. Discussion is made of the relative health of the water environment in certain Local Authority areas, including discussion of RBMP objectives where necessary, and on the flood risk in each area. Overall it is considered that although there is potential for negative impacts, it must be considered that legislation and Local Authority work at the LDP level will prevent negative impacts occurring.

## **Assessment of secondary, cumulative & synergistic effects**

### Secondary effects

4.18 Secondary effects are effects that are not a direct result of the SG, but are a secondary result of the original impact. The following secondary effects have been identified:

### *Climatic Factors*

4.19 The original SESplan SEA identifies a possible secondary effect on Climatic Factors from poor air quality in specific areas of the SESplan region. A rise in car usage could exacerbate greenhouse gases within the region. It is considered this assessment is still relevant when the assessment of the SG is considered, although the degree of this depends on the proportion of the additional allocations that are located in these specific areas of poor air quality and the proximity of sustainable transport links to the areas of poor air quality and the additional allocations.

### *Water*

4.20 Another possible secondary impact that was identified in the SESplan SEA was soil sealing within the SESplan region due to the development of greenfield land. It was found that this could impact on flooding incidents as the sealing of soil prevents soak away of water. It is considered that as the SG is highly likely to allocate additional allocations on greenfield land that this assessment is still relevant.

### *Cumulative effects*

4.21 Cumulative effects arise when a combination of developments accumulate together to have a significant effect, or where several individual effects of the SG have a combined effect. The following cumulative effects have been identified through the assessment process:

### *Air*

4.22 It is likely that there will be a cumulative impact on air quality in specific locations in the SESplan area due to increased car journeys from respective allocations in local authority areas, as well as from construction emissions. It is thought there could be particular pressure on key junctions or access routes into Edinburgh that flow from other local authorities (such as Sherrifhall roundabout), this would particularly be the case where effective public transport links were not provided.

### *Biodiversity, flora and fauna*

4.23 There is the potential for a cumulative effect on the biodiversity of the SESplan area. The development of additional allocations on greenfield land across the respective Local Authority areas may result in an overall loss of biodiversity for the SESplan area.

### *Climatic Factors*

4.24 Since a cumulative effect is identified on the Air SEA topic, due to increased emissions from motorised journeys and construction traffic, and the Soil SEA topic, due to potential soil erosion, soil sealing and loss of prime agricultural land from development on greenfield land, it is considered that this brings a potential adverse cumulative effect on the Climatic Factors SEA topic.

### *Soil*

- 4.25 The development of additional allocations on greenfield land may also result in a negative effect on soil quality in the SESplan area, due to soil erosion, soil sealing and loss of prime agricultural land.

### Synergistic Effects

- 4.26 Synergistic effects are a number of individual impacts that interact to produce a total effect that is different from the individual impacts identified. The following potential synergistic effects have been identified in terms of the SG:

### *Population & Human Health*

- 4.27 The original SESplan SEA identifies the potential of a synergistic impact on this SEA topic because of the combination of air pollution and a potential rise of CO<sub>2</sub> emissions could have an impact on human health issues. It is considered that this assessment still applies, however the development of the CSGN and open space associated with development of allocations will help to mitigate this effect.

## **5 Measures to prevent/reduce/offset significant adverse effects**

- 5.1 The assessment of the additional allocations and re-phasing of existing allocations raised a number of issues that will require to be mitigated to avoid significant effects on the environment of the SESplan area.
- 5.2 Table 7 below shows the issues that have been identified, the possible impact and the proposed measures for the prevention/reduction/offset of any significant effect.

Table 7 Measures envisaged for the prevention, reduction & offsetting of any significant adverse effects		
SEA Topic	Issues identified	Measures to reduce/prevent/offset
Air/Climatic Factors	Negative effect on air quality and increase in CO <sub>2</sub> emissions as a result of an increase in car journeys	<ul style="list-style-type: none"> <li>- Additional allocations must be served by sustainable forms of transport to ensure maximum opportunities for reduced car usage</li> <li>- Accessibility to the CSGN should be a key consideration in deciding precisely where additional allocations are located</li> <li>- Hot spot areas such as AQMA areas should be protected from further air pollution</li> <li>- Measures to promote modal shift to sustainable transport and the development of sustainable transport routes and infrastructure should be promoted</li> </ul>
Cultural Heritage	Impact of development of additional allocations on cultural heritage assets in the SESplan area	<ul style="list-style-type: none"> <li>- Design-led approach at LDP level to include assessment of development of allocations on cultural heritage assets</li> </ul>
Landscape & townscape	Impact of development of additional allocations on greenfield land on the setting and surrounds of settlements in the SESplan area	<ul style="list-style-type: none"> <li>- The SSA should prevent development being located where there is the risk of adverse effects on landscape designations, wider landscape and settlement setting</li> <li>- Allocation of land should provide places that are distinctive, in line with the Designing Places document, in that they positively respond to the wider landscape context in which they are situated</li> <li>- Conservation Areas should be protected through management plans and/or conservation area statements</li> </ul>
Soil	Soil sealing as a result of development on greenfield land	<ul style="list-style-type: none"> <li>- Brownfield sites should be primarily considered for additional allocations</li> <li>- Measures to reduce the impact of soil sealing should be considered wherever possible, such as permeable surfaces, green infrastructure and compensatory measures</li> </ul>
Water	Soil sealing within the SESplan region due to the development of greenfield land and impact on flooding incidents through run-off and loss of soak away land	<ul style="list-style-type: none"> <li>- Identification of compensatory storage opportunities, including within the CSGN (LDP level)</li> <li>- Identification of areas of strategic SUDs areas (LDP level)</li> <li>- Identification of vulnerable areas</li> </ul>



## **6 Monitoring**

- 6.1 The SG is essentially an extension of the SESplan document, and it is unclear whether there will be a requirement for a further Housing Supplementary Guidance over and above the future SESplan SDP 2 document.
- 6.2 This affects the monitoring of the SEA objectives in this document in that it is anticipated that monitoring should be undertaken by the SESplan member Local Authorities, as was the case for the original SESplan SEA.
- 6.3 A Monitoring Report has been undertaken for the SESplan. In the future, this report should incorporate the monitoring needs identified within the SESplan SEA and this SEA on the Housing Supplementary Guidance.

## **7 Next Steps**

- 7.1 The Housing Supplementary Guidance and the Environmental Report will go to consultation for a period of 6 weeks. After this time comments on both documents will be reviewed and appropriate changes made to the Supplementary Guidance before it is approved by the member Local Authorities and the SESplan board.
- 7.2 Once the document is approved a Post Adoption Statement will be prepared and advertised and circulated as per the requirements of the Environmental Assessment (Scotland) Act.

Appendix 1: Consultation Authority Comments on Scoping Report		
Consultation Authority	Summary of Comments	Response and action
Historic Scotland	...understanding from the screening report is that the supplementary guidance will provide guidance on how much of the housing land requirement for the SESplan area will be in each of the six SESplan Local Authority areas, both in the period 2009-2029 & 2019-2024. The guidance will be based on analysis of opportunities and of infrastructure and environmental capacities and constraints and will be undertaken in consultation with the six constituent Local Authorities. I note that it is SESplan's view that the Draft Housing SG is likely to have significant environmental effects. In light of the information included in the screening report I agree that it is likely that the SG will have significant effects on the historic environment.	<p>The understanding is correct, however it should be noted there was a typographical error in the Screening/Scoping statement which is repeated here: the first phase of housing is 2009-2019 not 2009-2029.</p> <p>It is not considered that any action needs to be taken as a result of this representation.</p>
SEPA	...in respect of our main areas of interest (air, water, soil, human health, material assets (of which we have a specific interest in waste) and climatic factors) the Draft SESplan Housing Supplementary Guidance is likely to have significant environmental effects.	Note agreement on the likelihood of significant environmental effects.
	...we consider that significant effects are with respect to flood risk, air quality and climate change (mitigation and adaptation). As identified in the screening report, these effects could be experienced in proposed new allocations and in existing allocations where cumulative or in-combination effects should be considered.	Note opinion on the effect on the respective SEA topic and the nature of the effect likely to be experienced.

	<p>...you will be aware that the next stage requires the Responsible Authority to consult the Consultation Authorities on the proposed scope and level of detail to be included within the Environmental Report. This can be undertaken through preparation of a concise Scoping Report.</p> <p>We would encourage you to use the scoping process to focus the assessment on those SEA issues upon which there are likely to be significant environmental effects, to outline the baseline information you consider as most relevant and explain your proposed methodology of assessment</p>	<p>The submission to the SEA gateway on 13 August contained a Screening and Scoping Statement and as a result a further separate submission is not forthcoming. However, it is considered that the original report did explain the approach the assessment of SEA issues would take; outlined the approach to the prospective baseline; and explained the methodology of the assessment that would be included in the Environmental Report</p>
SNH	<p>Table 2 refers to Habitats Regulations Appraisal in relation to “impact on European species”. While this is likely a typographical error, we wish to confirm that HRA considers effects on European sites</p>	<p>This is a typographical error and further references in the Environmental Report will be updated.</p>
	<p>We note that a period of up to 12 weeks is proposed for consultation on the draft supplementary guidance. As it is expected that the Environmental Report will go to consultation alongside the supplementary guidance, we assume this will run for the same length of time. We are content with the indicated consultation period.</p>	<p>It is anticipated that the consultation periods will run concurrently</p>
	<p>Criterion 2c- transboundary effects: significant effects are predicted for this criterion, with the summary of these referring to changes outwith the SESplan area, including the Forth Estuary. In the context of SEA, transboundary effects are those which would affect another EU Member State. As there is nothing to suggest that this would be the case, the answer in column 2 can be changed to No.</p>	<p>The information on transboundary effects in the context of SEA is noted and taken on board in preparation of the Environmental Report.</p>
	<p>Relationship with other PPS- we agree with the proposed approach to the baseline for PPS and other environmental objectives</p>	<p>Agreement of these elements of the Environmental Report and methodology is noted.</p>

	<p>Current state of the environment- The additional use of an update to the Spatial Strategy Assessment to inform identification of the most appropriate locations for housing is useful for supporting and refining assessment...we welcome this more streamlined approach to the assessment.</p>	<p>Support for the methodology of the assessment is noted.</p>
	<p>Green belt- Table 2 includes the green belt under Climatic Factors. SPP sets out the functions of the green belt as directing planned growth; protecting and enhancing the quality, character, landscape setting and identity of towns and cities; and, protecting and giving access to open space within and around towns and cities...suggest that the green belt should be included as an issue under the Landscape &amp; Townscape SEA topic.</p>	<p>This clarification on the purpose of the green belt is useful and it will be primarily considered under the Landscape &amp; Townscape SEA topic in the Environmental Report for the reasons described in SPP.</p>
	<p>SEA topics- we agree that all of the SEA topics should be re-examined in the Environmental Report</p> <p>SEA topics- Scope &amp; level of detail-</p> <ul style="list-style-type: none"> <li>- Areas that were previously excluded from the SDAs on the grounds of sustainability appear likely to be revisited to meet the housing number requirements. In doing so, we refer you to the design-led approach set out in the draft revised SPP, which seeks to balance the range of interests and potential opportunities over the long term. While the detail will be set out in the LDPs, the draft revised SPP is clear that the design-led approach applies at all levels</li> <li>- The screening and scoping report refers to 'certain locations' throughout. We are unclear as to how these relate to the SDAs and look forward to discussing this further on 28 August and as the supplementary guidance is developed</li> </ul>	<p>Note agreement on the finding that all SEA topics should be re-examined.</p> <ul style="list-style-type: none"> <li>- The reference to the design-led approach as set out in the draft revised SPP is noted and it is considered reference can be made to this where appropriate in the Environmental Report.</li> <li>- 'certain locations' was intended to show that particular parts of the SESplan area that are considered for either re-phasing of existing housing allocations, or for additional allocations, are likely to experience different environmental effects i.e. some areas may be at risk of flooding,</li> </ul>

		while in other areas this could not occur. The wording can be more carefully articulated in the Environmental Report.
	Framework for assessment- We accept the proposed framework for assessment...the design-led approach...should be applied to the SDAs and certain locations where changes in numbers and phasing are proposed.	Support for the proposed assessment framework is noted. The design-led approach can be incorporated where appropriate in the Environmental Report.
	Monitoring- The screening and scoping report states at paragraph 6.6 that the SEA process is likely to culminate in the post-adoption statement. This statement appears to omit monitoring from the SEA process.	It was not intended to omit monitoring from the SEA process. A chapter on monitoring will be included in the Environmental Report.

<b>Appendix 2 Relevant Plans, Policies and Strategies</b>		
<b>Name of Plan</b>	<b>Environmental Requirements of Plan</b>	<b>Implications for the SEA</b>
Air		
The Air Quality Strategy for England, Scotland, Wales and Northern Ireland. Working Together for Clean Air (2007)	Sets out the air quality strategy for the UK with objectives and targets, referring to the Environment Act 1995 legislation. It seeks a reduction in the levels of 8 harmful pollutants present in the air, which in turn promote: <ul style="list-style-type: none"> <li>• the protection of human health; and</li> <li>• the protection of vegetation and ecosystems</li> </ul>	<b>Air &amp; Population &amp; Human Health:</b> SG should ensure that housing allocations do not exacerbate existing Air Quality Management Areas (AQMA), nor result in designation of further AQMA
Local Air Quality Management Act (Part of the Environmental Act 1995)	Sets out duties requiring local authorities to review and assess air quality in their area from time to time, the reviews forming the cornerstone of the system of local air quality management.	<b>Air:</b> sets out requirements to reduce air pollution which SG should adhere to. <b>Population &amp; Human Health:</b> looks to maintain and improve air quality for the benefit of human health to which the SG should take cognisance of.
Edinburgh Air Quality Action Plan (2008- 2010)	Sets out declared Air Quality Management Areas (AQMA) and details the initiatives required to meet targets to improve air quality.	<b>Air:</b> sets out initiatives to reduce air pollution which SG should take cognisance of. <b>Population &amp; Human Health:</b> looks to improve air quality for the benefit of human health to which the SG should take

		cognisance of.
Scotland's National Transport Strategy (2006)	<ul style="list-style-type: none"> <li>• Promote social inclusion by connecting remote and disadvantaged communities and increasing the accessibility of the transport network:</li> <li>• Protect our environment and improve health by building and investing in public transport and other types of efficient and sustainable transport which minimize emissions and consumption of resources and energy</li> <li>• Improve safety of journeys by reducing accidents and enhancing the personal safety of pedestrians, cyclists, drivers, passengers and staff.</li> </ul>	<p><b>Material Assets:</b> SG should seek to integrate with the aims of the National Transport Strategy.</p> <p><b>Population &amp; Human Health:</b> SG should aim to allocate housing levels which allow for sustainable development, particularly access to sustainable transport methods</p>
Strategic Transport Projects Review (STPR) (2008) (Draft Subject to SEA Consultation)	<p>STPR complements the National Transport Review and seeks to:</p> <ul style="list-style-type: none"> <li>• improve journey times and connections – to tackle congestion and the lack of integration and connections in transport which impact on our high level objectives for economic growth, social inclusion, integration and safety</li> <li>• reducing emissions – to tackle the issues of climate change, air quality and health improvement which impact on our high level objective for protecting the</li> </ul>	<p><b>Material Assets:</b> SG should seek to integrate with the aims of the STPR.</p> <p><b>Population &amp; Human Health:</b> SG should support the STPR interventions aimed at reducing congestion, emissions etc and improving human health. As well as to promote allocations accessible by sustainable transport</p> <p><b>Climatic Factors and Air:</b> SG should support the STPR interventions aimed at reducing</p>

	<p>environment and improving health, and</p> <ul style="list-style-type: none"> <li>improving quality, accessibility and affordability – to give people a choice of public transport, where availability means better quality transport services and value for money or an alternative to the car</li> </ul>	<p>congestion, emissions etc such as tackling issues of climate change and the availability of better forms of public transport to reduce dependency on cars.</p>
SESTRAN Regional Transport Strategy (2008-2023)	<ul style="list-style-type: none"> <li>to ensure that development is achieved in an environmentally sustainable manner: reducing greenhouse gas emissions and other pollutants and enabling sustainable travel/ reduce car dependency</li> <li>to promote a healthier and more active SEStran area population</li> </ul>	<p><b>Material Assets:</b> SG should seek to integrate with the aims of the transport strategy</p> <p><b>Climatic Factors and Air Quality:</b> SG should contribute to ensuring that development is achieved in an environmentally sustainable manner, helping to maintain air quality where possible</p> <p><b>Population &amp; Human Health:</b> SG should promote allocations with sustainable access to recreation</p>
SPP Planning for Transport	<p>The national focus on transport is now on delivery of transport projects. For the transport network to most effectively support the economy, land use planning should assist in reducing the need to travel; in creating the right conditions for greater use of sustainable transport modes and in restricting adverse environmental impacts.</p>	<p><b>Material Assets:</b> the SG should plan allocations which assist in reducing the need to travel and contributes to sustainable transport nodes.</p>



PAN 75 Planning for Transport	PAN 75 accompanies SPP and aims to create greater awareness of how linkages between planning and transport can be managed. It highlights the roles of different bodies and professions in the process and points to other sources of information.	<b>Material Assets:</b> the SG should plan allocations in a manner which assists in reducing the need to travel and contributes to sustainable transport nodes.
<b>Biodiversity, Flora and Fauna</b>		
Nature Conservation (Scotland ) Act (2004)	Introduced a 'duty to further the conservation of biodiversity' for all public bodies, and sets out more specific provisions within this (e.g. for SSSIs). Also states a requirement for the preparation of a Scottish Biodiversity Strategy, to which all public bodies should pay regard.	<b>Biodiversity, flora &amp; fauna:</b> SG should aim to avoid allocations where the region's natural heritage assets may be adversely affected.
Scotland's Biodiversity – It's In Your Hands. A strategy for the conservation and enhancement of biodiversity in Scotland (2004)	Sets out Scottish aims relating to biodiversity over 25 year period. Seeks to go beyond a previous emphasis on protecting individual sites to achieve conservation at a broader scale. Aims to halt loss and reverse decline of key species, to raise awareness of biodiversity value at a landscape or ecosystem scale, and to promote knowledge, understanding and involvement amongst people.	<b>Biodiversity, flora &amp; fauna:</b> SG should aim to avoid allocations where the region's natural heritage assets may be adversely affected.
Choosing Our Future – Scotland's Sustainable Development	Details the Scottish Government's strategy for tackling issues such as climate change, biodiversity, resource use and pollution.	<b>Biodiversity, flora &amp; fauna:</b> SG should aim to avoid allocations where the region's natural heritage assets may be adversely affected.

Strategy (2005)		<p><b>Climatic Factors &amp; Air:</b> SG should allocate housing land to minimise the impact on climate change and to build in mitigation and climate change adaptation.</p> <p><b>Material Assets:</b> SG should aim to minimise resource depletion and encourage the responsible use of natural resources by allocating land in sustainable locations</p>
SPP: Natural Heritage PAN 60 Planning for Natural Heritage (2000)	The conservation of Scotland's plants, animals, landscapes, geology, natural beauty and amenity is important and should be considered in all development plans.	<p><b>Biodiversity, flora &amp; fauna &amp; Landscape &amp; townscape:</b> SG should aim to avoid allocations where the region's natural heritage assets and designated landscapes may be adversely affected.</p>
The Scottish Forestry Strategy (2006) (and associated SEA)	<p>Key themes include to:</p> <ul style="list-style-type: none"> <li>• reduce the impact of climate change;</li> <li>• get the most from Scotland's increasing and sustainable timber resource;</li> <li>• make access to and enjoyment of woodlands easier</li> </ul>	<p><b>Biodiversity, flora &amp; fauna:</b> SG should avoid allocations which may adversely affect the region's forest assets</p> <p><b>Population &amp; Human Health:</b> SG should aim to allocate land where access to biodiversity and green infrastructure benefits is possible</p>

	<ul style="list-style-type: none"> <li>• for all to improve health;</li> <li>• protect the environmental quality of our natural resources; and</li> <li>• help to maintain, restore and enhance Scotland's biodiversity</li> </ul>	by sustainable means
<p>Local Biodiversity Action Plan's East Lothian (2008 – 2013)</p> <p>Edinburgh (2004-2009)</p> <p>Fife Local Biodiversity Action Plan (2009-2011)</p> <p>Midlothian (2006)</p> <p>Scottish Borders (2001)</p> <p>West Lothian (2005 – 2009)</p> <p>Midlothian Biodiversity Guidance for Developers (2008)</p>	<p>The LBAPs translate national targets for species and habitats into effective local action, stimulates local working partnerships into tackling biodiversity conservation, raises awareness, identify local resources, identify local targets for species and habitats, ensure delivery and monitor progress.</p>	<p><b>Biodiversity, flora &amp; fauna:</b> SG should avoid adversely affecting key habitats and species as identified therein by allocating land where likely significant effects will be avoided.</p>
<p>Environmental Strategies</p> <p>Edinburgh Environmental Strategy</p> <p>Draft East Lothian Environment Strategy (2007 – 2009)</p>	<p>Key themes include:</p> <ul style="list-style-type: none"> <li>• safeguard, promote and improve the social, economic, environmental and democratic wellbeing of all the people in the local authority area</li> </ul>	<p><b>Biodiversity, flora &amp; fauna:</b> SG should avoid adversely affecting the biodiversity assets of the region by allocating land where likely significant effects will be avoided.</p> <p><b>Population &amp; Human Health:</b> SG should aim</p>

<p>Take a Pride in Fife – Environmental Strategy for Fife – Review and Update (2006) Scottish Borders New Ways Environmental Strategy</p>		<p>to allocate land where access to biodiversity and green infrastructure benefits is possible by sustainable means</p>
<p>Local Woodland/ Forestry Strategies Edinburgh and the Lothians Forestry and Woodland Strategy (2012-2017)  Fife Indicative Forestry Strategy  Scottish Borders Woodland Strategy (2005)</p>	<p>The creation, through forestry and woodland initiatives, of an attractive environment providing biodiversity and green infrastructure benefits and to improve the health and well being of the area.</p>	<p><b>Biodiversity, flora &amp; fauna:</b> SG should avoid allocations which may adversely affect the region's forest assets  <b>Population &amp; Human Health:</b> SG should aim to allocate land where access to biodiversity and green infrastructure benefits is possible by sustainable means</p>

<p>Planning Scotland's Seas Scotland's National Marine Plan Consultation Draft</p>	<p>Sets a strategic plan to cover inshore waters (to 12 nautical miles) and offshore waters (12-200 nautical miles). Marine planning will interact with other planning and consenting regimes. The Scottish marine planning system should promote development and activities that support sustainable economic growth.</p>	<p><b>Biodiversity, flora &amp; fauna:</b> SG should avoid allocating land where marine based natural heritage assets may be adversely affected. <b>Water:</b> SG should avoid allocating land where designated water bodies may be adversely affected. Allocated land should aim to fit with relevant policy aims for water bodies</p>
<p>Climatic Factors</p>		
<p>SPP : Renewable Energy Pan 45 Renewable Energy Technologies (2005) (and Annex on Planning for Micro-renewables) PAN 84 Reducing Carbon Emissions in New Development (2008)</p>	<p>The Scottish Ministers have set a target of generating 80% of Scotland's electricity from renewable sources by 2020. The importance of using clean and sustainable energy from renewable sources will continue to increase as a result of global imperatives to tackle climate change and the need to ensure secure and diverse energy supplies. PAN 45 complements SPP and highlights examples of good practice across Scotland. A key role of the planning system is to support a move towards low and zero carbon development through the use of energy efficient, micro-generating and decentralised renewable energy systems. PAN 84 provides information and guidance on</p>	<p><b>Climatic Factors, Air &amp; Material Assets:</b> SG should consider the allocation of land where the possibility of infrastructure to assist towards low and zero carbon development can be explored</p>

	implementing the targets set in SPP.	
Changing Our Ways – Scotland’s Climate Change Programme (2006)	Details the Scottish Executive’s (now Government’s) programme for reducing and adapting to climate change.	<b>Climatic Factors, Air &amp; Material Assets:</b> SG should consider the allocation of land where the possibility of infrastructure to assist towards low and zero carbon development can be explored
Climate Change (Scotland) Act 2009	Act to: <ul style="list-style-type: none"> <li>• set a target for the year 2050, an interim target for the year 2030, and to provide for annual targets, for the reduction of greenhouse gas emissions;</li> <li>• to provide about the giving of advice to the Scottish Ministers relating to climate change;</li> <li>• to confer power on Ministers to impose climate change duties on public bodies;</li> <li>• to make further provision about mitigation of and adaptation to climate change;</li> <li>• to make provision about energy efficiency;</li> <li>• to make provision about the reduction and recycling of waste</li> </ul>	<b>Climatic Factors, Air &amp; Material Assets:</b> SG should consider the allocation of land where the possibility of infrastructure to assist towards low and zero carbon development can be explored.

Energy Efficiency and Microgeneration: achieving a Low Carbon Future: A Strategy for Scotland (2008)	Strategy sets out the action to take to help Scotland meet carbon savings targets etc outlined in Changing Our Ways – Scotland’s Climate Change Programme (2006) through improving energy efficiency and encouraging a greater uptake of microgeneration.	<b>Climatic Factors, Air &amp; Material Assets:</b> SG should consider the allocation of land where the possibility of infrastructure to assist towards low and zero carbon development can be explored.
Biomass Action Plan for Scotland (2007)	The Biomass Action Plan sets out a coordinated programme for the development of the biomass sector in Scotland and aims to: <ul style="list-style-type: none"> <li>• provide a summary of the wide range of existing activities, actions and initiatives;</li> <li>• provide a focus for a strategic coordinated approach to developing biomass for energy production across the heat, electricity and transport sectors;</li> <li>• identify roles and responsibilities for government, industry and public stakeholders to develop a vibrant bioenergy industry in Scotland; and</li> <li>• identify future actions and gaps</li> </ul>	<b>Climatic Factors, Air &amp; Material Assets:</b> SG should consider the allocation of land where the possibility of infrastructure to assist towards low and zero carbon development can be explored, particularly with regard to biomass.
Scotland’s Climate Change Adaptation Programme	Sets out Scottish Minister objectives, proposals & policies for addressing the impacts identified by the UK Climate	<b>Climatic Factors, Air &amp; Material Assets:</b> SG should consider the allocation of land and the

- Consultation	Change Risk Assessment that have been identified as a priority for Scotland over the next 5 years.	potential to either avoid impacts which may affect climate change, or combine with climate change adaptation/mitigation measures
<b>Cultural Heritage (including architectural and archaeological heritage)</b>		
Scottish Historic Environment Policy (SHEP) (July 2011)	SHEP is the overarching policy statement for the historic environment. It provides a framework for more detailed strategic policies and operational policies that inform the day-to-day work of a range of organisations that have a role and interest in managing the historic environment.	<b>Cultural Heritage:</b> SG should impact as little as possible on the historic environment.
SPP: Planning and the Historic Environment	The historic environment is a vital contribution to Scotland's cultural heritage and contributes to our understanding of the past and present. The conservation of the historic environment should be carefully integrated with other policies to ensure its survival.	<b>Cultural Heritage:</b> SG should impact as little as possible on the historic environment.
PAN 71 Conservation Area Management	This provides further advice on the management of conservation areas. It identifies good practice for managing change, sets out a checklist for appraising conservation areas and provides advice on funding and implementation.	<b>Landscape and Townscape:</b> SG should aim to avoid a negative impact on conservation areas in the SESplan area.
<b>Landscape and Townscape</b>		
Creating Places A Policy	Policy statement on architecture and place which looks to	<b>Landscape and Townscape:</b> the value of



Statement on architecture and place (2013)	consolidate and develop the value of architecture and place in Scotland. The policies contained within the document promote good design and are material considerations in determining applications	quality places and design should be considered when allocating land in the SG
Designing Places: A Policy Statement for Scotland (2001)	Policy statement on design which sets out the overarching policy on design including the six qualities that make a successful place –distinctive, safe and pleasant, easy to get to and move around, welcoming, adaptable and resource efficient.	<b>Landscape and Townscape:</b> the six qualities of good design that make a successful place should be considered when allocating land in the SG
Pan 44 Fitting New Housing Development into the Landscape	Strategically, establishing landscape capacity and the relationship of new to existing urban forms as primary factors in determining the desirability of settlement expansion  Promoting higher design standards relative to form layout and relation with existing urban areas	<b>Landscape and Townscape:</b> SG should promote development which fits into the existing landscape and townscape.
SPP Planning and countryside designations	The SPP sets out the national planning policy framework for the protection of prime agricultural land and green belt objectives.	<b>Landscape and Townscape:</b> SG should reflect national policy on agricultural land and green belts.
Pan 52 Planning and Small Towns	Identifying factors which threaten the important legacy of small towns: <ul style="list-style-type: none"> <li>• Providing for regeneration and expansion</li> </ul>	<b>Landscape and Townscape:</b> SG should take cognisance of the aims of the document when considering allocating land which may affect

	<ul style="list-style-type: none"> <li>• Enabling lively, active and vibrant town centres within small towns</li> <li>• Enabling efficient and effective transport to support economic growth and accessibility</li> <li>• Promoting high quality design that promotes townscape quality</li> </ul>	small towns
PAN 65 Planning and Open Space (2003)	Provides advice on the role of the planning system in protecting and enhancing existing open spaces and providing high quality new spaces.	<b>Landscape and Townscape and Population and human health:</b> SG should aim to allocate land which has the potential to access or incorporate high quality open space
PAN 72: Housing in the Countryside	Advice on design of houses in the countryside with a purpose to create more opportunities for good quality rural housing which respects Scottish landscapes and building tradition.	<b>Landscape and Townscape:</b> SG should seek to create opportunities for good quality rural housing in the SESplan area, if applicable in the determination of allocations.
SPP: Planning for Rural Development	Planning policy which encourages a more supportive attitude towards 'appropriate' development whilst acknowledging and valuing the diversity of rural Scotland.	<b>Landscape and Townscape:</b> SG should seek to create opportunities for good quality rural housing in the SESplan area, if applicable in the determination of allocations.
SPP: Green Belts	Key objectives of green belt policy are: <ul style="list-style-type: none"> <li>• To direct planned growth to the most appropriate locations and support regeneration;</li> </ul>	<b>Landscape and Townscape:</b> SG should respect designated green belts within the SESplan area in the allocation of housing

	<ul style="list-style-type: none"> <li>• To protect and enhance the character, landscape setting and identity of towns and cities; and</li> <li>• To protect and give access to open space within and around towns and cities, as part of the wider structure of green space</li> </ul>	land.
<p>Landscape Character Assessments</p> <p>Edinburgh Landscape Character Assessment (2010)</p> <p>Landscape capacity studies for Lochgelly, Glenrothes, Kirkcaldy and Levenmouth - undertaken by Alison Grant for Fife Council (2002)</p> <p>Fife Local Landscape Designation Review 2008/9</p> <p>The Lothians Landscape Character Assessment (1998)</p> <p>Edinburgh Greenbelt Landscape Character Assessment (2008)</p>	<p>The aim of Landscape Character Assessments is to classify landscape within certain areas, to identify the forces for change which may affect their distinctive character, give guidelines for conservation/enhancement of the different types of landscape and to find opportunities for landscape conservation, restoration or enhancement</p>	<p><b>Landscape and Townscape:</b> SG should seek to support conservation and enhancement of different types of landscape in the SESplan area.</p>

The Special Qualities of the National Scenic Areas	The work provides a complete picture of Scotland's nationally designated landscapes. This is done through an update of the original reasons for the designation and through provision of a methodology to assess special qualities of the National Scenic Areas, two of which are located in the SESplan area	<b>Landscape and Townscape:</b> SG should seek to support conservation and enhancement of the two nationally designated landscapes in the SESplan area and their special qualities.
Second State of Scotland's Greenspace Report	Sets out the amount and types of greenspace for all of urban Scotland. Charts Local Authority progress on open space strategies	<b>Landscape and Townscape and Population and human health:</b> SG should aim to allocate land which has the potential to access or incorporate high quality open space
<b>Material Assets</b>		
Rural Development Programme for Scotland, The Strategic Plan, 2007-2013 (2006)	<ul style="list-style-type: none"> <li>• Promote an environmentally sustainable industry by targeting capital investment to mitigate farm pollution and secure environmental improvement;</li> <li>• developing products that reflect the high quality of the natural and cultural heritage; and</li> <li>• supporting the production of feedstock for renewable energy production</li> </ul>	<b>Climatic Factors:</b> SG should take cognisance of the need to produce feedstock for renewable energy production and any potential for conflict with allocating land for housing.
Zero Waste Plan (2010)	The aims of the Plan are to create a stable framework that will provide confidence for the investment necessary to deliver a zero waste Scotland over the next 10 years. To	<b>Material Assets:</b> SG should consider measures for sustainable waste management when allocating housing land

	achieve this Scotland's demand on primary resources by minimizing Scotland's demand on primary resources, and maximizing the reuse, recycling and recovery of resources instead of treating them as waste.	
SPP: Planning for Waste Management	<p>Waste has increased in volume and complexity over the last five decades and the guidance sets out options to follow to:</p> <ul style="list-style-type: none"> <li>• reduce waste;</li> <li>• re-use;</li> <li>• recovery by recycling;</li> <li>• waste as a source of energy; and</li> <li>• treatment and disposal of the remaining waste in a sustainable and environmentally friendly manner</li> </ul>	<b>Material Assets:</b> SG should consider measures for sustainable waste management when allocating housing land
<b>Population &amp; Human Health</b>		
Our National Health: A Plan for Action, A Plan for Change (2000)	Poverty, poor housing, homelessness and the lack of educational and economic opportunity are the root causes of major inequalities in health in Scotland. The core aims are to build a national effort to improve health and to reduce inequalities in health.	<b>Population &amp; Human Health:</b> SG should consider the location of housing allocations in contributing to improving the health of the SESplan area.
SPP: Physical Activity and Open Space	<ul style="list-style-type: none"> <li>• To protect and enhance open space;</li> <li>• To ensure a strategic approach to open space and</li> </ul>	<b>Population &amp; Human Health:</b> SG should consider access to areas for sport and

	<p>other opportunities for sport and recreation by requiring local authorities to undertake an open space audit and prepare an open space strategy for their area;</p> <ul style="list-style-type: none"> <li>• To protect and support opportunities for sport and recreation;</li> <li>• To provide guidance on the quality and accessibility of open space in new developments and on providing for its long-term maintenance and management;</li> <li>• To provide guidance on planning for development of new indoor and outdoor facilities for sport and recreation.</li> </ul>	recreation by sustainable means when allocating housing land
Member Authority Health and Wellbeing Plans and Joint Health Improvement Plans	<p>Health and wellbeing are fundamental to quality of life. Improving health and addressing health inequality involves wide-ranging action across not just health and care services but also public services including education, employment, housing, community safety and environment.</p>	<b>Population &amp; Human Health:</b> SG should consider how the allocation of housing land can positively affect health in the SESplan area
Member Authority Core Paths Plans and Access Strategies	Core Paths Plans and Access strategies look to promote themes of:	<b>Population &amp; Human Health:</b> SG should contribute towards improving the health and

	<ul style="list-style-type: none"> <li>• green spaces</li> <li>• human health and well being</li> <li>• accessibility</li> <li>• inclusion</li> <li>• biodiversity</li> </ul>	well being of the SESplan area by promoting housing which is close to core paths and accessibility to the countryside and green spaces.
Central Scotland Green Network	<p>The Central Scotland Green Network looks to promote:</p> <ul style="list-style-type: none"> <li>• Access to attractive, safe and well maintained greenspace or accessible countryside</li> <li>• to improve the green infrastructure of all our major towns and cities by investing in green and blue space, tree planting and sustainable urban drainage</li> <li>• to deliver a threefold increase in the area of land used for community growing – allotments, orchards and gardens</li> <li>• to deliver a strategic network of high-quality routes for active travel and recreation throughout Central Scotland</li> <li>• to ensure that the green network is used by everyone to improve health and well-being through physical activity and contact with nature, volunteering and learning outdoors</li> <li>• to foster community pride and ownership in the CSGN and to use the green network as a community resource, providing opportunities for education, volunteering, training, skills development and</li> </ul>	<b>Population &amp; Human Health:</b> SG should consider the potential for housing allocations to be accessible to the Central Scotland Green Network

	employment in land-based and low-carbon industries	
Member Authority Community Plans or Single Outcome Agreements (SOAs)	Community Plans and SOAs focus on achieving measurable improvements to the quality of life for all in the local authority area and provide a framework for delivering long term visions for the area. The Community Plan sets the context for continued joint working between the Local Authority Area and the local community and its partner agencies.	<b>Population &amp; Human Health:</b> SG should consider any community plan indicators on housing when allocating land in the SESplan area
Member Authority Strategic Housing Investment Plan (SHIP)	SHIPs set out how investment in affordable housing will be directed over the next 5 years to achieve the outcomes set out in there associated Local Housing Strategy.	<b>Population &amp; Human Health:</b> SG should take account of the outcomes set out in each local authority areas Local Housing Strategy.
Strategic Noise Action Plan for the Edinburgh Agglomeration	The three main objectives of the Directive are as follows: <ul style="list-style-type: none"> <li>• To determine the noise exposure of the population through noise mapping</li> <li>• To make information available on environmental noise to the public</li> <li>• To establish Action Plans based on the mapping results, to reduce noise levels where necessary, and to preserve environmental noise quality where it is good</li> </ul>	<b>Population &amp; Human Health:</b> SG should not add to noise levels and seek to preserve noise quality where it is good, when allocating housing land.



Pan 74 Affordable Housing	Advice setting out how the planning system can support the Scottish Government's commitment to increase the supply of affordable housing.	<b>Population and Human Health:</b> SG should make clear affordable housing will be a proportion of the housing land to be allocated
<b>Soil</b>		
PAN 33 Development of Contaminated Land (2000)	Document provides advice with regards to the development of contaminated land, which any developments will need to adhere to.	<b>Soil:</b> SG should follow this guidance on development in areas of contaminated land.
The Contaminated Land (Scotland) Regulations (2005)	Details activities that are prohibited to prevent the contamination of land and watercourses.	<b>Soil:</b> SG should not conflict with these regulations.
Scottish Soil Framework (2009)	The main aim of the Framework is to promote the sustainable management and protection of soils consistent with the economic, social and environmental needs of Scotland. Activities identified for focus include: <ul style="list-style-type: none"> <li>• soil organic matter stock protected</li> <li>• soil erosion reduced</li> <li>• greenhouse gas emission from soils reduced</li> <li>• soil's capacity to adapt to changing climate enhanced</li> <li>• soil biodiversity as well as above ground biodiversity</li> </ul>	<b>Soil:</b> SG should promote the sustainable management of soils.

	<ul style="list-style-type: none"> <li>protected soils making a positive contribution to sustainable flood management</li> </ul>	
<b>Water</b>		
The Water Environment and Water Services (Scotland) Act 2003 (Designation of Scotland River Basin District) Order 2003	Ensures that all human activity that can have a harmful impact on water is controlled.	<b>Water:</b> SG should follow all appropriate guidance and legislation.
SEPA (2008) Finalised River Basin Management Plans: Scotland River Basin District and Solway Tweed River Basin District	<ul style="list-style-type: none"> <li>Identifying areas of the water environment for protection and improvement</li> <li>Identifying where current or historic activities are constraining the quality of the water environment and the biodiversity it supports</li> <li>Details the actions required to ensure waters of special value (e.g. drinking, biodiversity, shellfish, bathing) are up to standard and maintain the quality where they already meet those standards</li> <li>Set out actions needed to deliver environmental improvements over the next 6 years and longer to 2027</li> </ul>	<b>Water:</b> SG proposals should avoid deterioration of the water environment.
Flood Risk Management	The Scottish Ministers, SEPA and responsible authorities	<b>Water:</b> SG should not create flood risks

(Scotland) Act 2009	<p>must exercise their flood risk related functions with a view to reducing overall flood risk through:</p> <ul style="list-style-type: none"> <li>• promotion of sustainable flood risk management, acting with a view to raising public awareness of flood risk, and acting in the way best calculated to contribute to the achievement of sustainable development.</li> </ul>	through the allocation of housing land
SPP: Planning and Flooding	<p>SPP provides guidance to developers and planning authorities on planning and flooding. New development should not take place if it would be at significant risk of flooding from any source or would materially increase the probability of flooding elsewhere. The storage capacity of functional floodplains should be safeguarded, and works to elevate the level of a site by land raising should not lead to a loss of flood water storage capacity.</p> <p>Drainage would be a material consideration and the means of draining a development should be assessed. Sustainable drainage would be required whenever practicable and watercourses should be culverted. Flood prevention and alleviation measures should respect the wider environmental concerns and appropriate engineering</p>	<b>Water:</b> SG should not create flood risks through the allocation of housing land

	solutions recognise the context provided by the development plan. Whilst it is preferable for open spaces to flood rather than buildings it may not always be acceptable.	
PAN 69: Planning and Building Standards Advice on Flooding (2004)	The PAN supports SPP.	<b>Water:</b> SG should not create flood risks through the allocation of housing land
Member Authority biennial reports on flooding	Under the Flood Prevention and Land Drainage (Scotland) Act 1997 Local Authorities are required to publish a report at 2 yearly intervals specifying: the measures which they consider that they require to take to prevent or mitigate the flooding of land in their area; the measures which they have taken since the date of publication of their previous report to prevent or mitigate the flooding of such land and all occurrences of flooding of such land since that date	<b>Water:</b> SG should not create flood risks through the allocation of housing land
SPP: Coastal Planning	SPP notes that the developed coast should be the focus for developments requiring a coastal location, or which contribute to economic regeneration of settlements whose livelihoods is dependent on coastal or marine activities and features.	<b>Water:</b> SG should ensure any housing at a coastal location is necessary for the vitality of the area in question
SEPA Position Statement to	Position statement sets out the aims to prevent	<b>Water Status:</b> SG should take account of the

support the implementation of Water Environment (controlled activities) (Scotland) Regulations 2005: - Culverting watercourses	environmental issues associated with culverting	environmental issues associated with culverting and seek to avoid the need to implement any culverting from the allocation of land.
Scottish Water Strategic Asset Capacity and Development Plan	Outlines the current capacity at water and wastewater treatment works across Scotland to let local authorities and developers see “at a glance” what capacity currently exists at a particular location in Scotland. It is intended to use this information to decide whether work will have to be carried out by Scottish Water to increase capacity at treatment works to enable a particular development to go ahead.	<b>Water:</b> SG should check current capacity before allocating major land in the SESplan area.
Scottish Water, Water Resource Plan (2008)	Set out the strategy to ensure that customers, the length and breadth of Scotland, have a secure supply of clear, fresh, safe drinking water to 2031/32 and beyond. The key environment challenges are: to adapt to pressures on water resources due to climate change and environmental constraints.	<b>Water:</b> SG should not add any additional pressure to Scottish Water resources.
The Marine (Scotland) Act (2010)	The Marine (Scotland) Act provides a framework which will help balance competing demands on Scotland's seas. It	<b>Water:</b> SG should take account of the Marine Bill when planning anything that could impact on coastal waters and/or the sea

	introduces a duty to protect and enhance the marine environment and includes measures to help boost economic investment and growth in areas such as marine renewables	
Fife Shoreline Management Plan: Second Generation (2011)	Takes into account natural coastal processes, existing development, need for coastal defences, environmental considerations and planning issues. Delivers policies to guide sustainable coastal management over the next 20, 50 and 100 years	<b>Water:</b> SG should be aware of and take account of the natural heritage interests along the Fife coast.
Other		
NPF2 and SPP Scottish Planning Policy (2010)	Set out the national planning framework and the main purpose and tasks for land use planning, development planning and control for Scotland.	<b>All:</b> underpins the development and implementation of the SG.

## APPENDIX 3: Detailed Assessments

Possible rankings					
Very Positive	Positive	Negative	Very Negative	Neutral	Unknown
✓	✓✓	x	xx	0	?

**Table 1: City of Edinburgh**

Environmental Objectives	Potential impact of change to allocation and phasing on environmental objectives	Comments
<b>Air:</b> To sustain current air quality levels	<b>0</b>	<p>The updated SSA states that south east Edinburgh and west Edinburgh are preferred locations for additional development. The SG puts forward an additional 1500 houses in South East Edinburgh and an additional 700 in West Edinburgh. Edinburgh is where the majority of employment, services and other destinations are located and relative distances from the SDAs (and areas outwith) are close to these areas, so much so that public transport and sustainable transport links are an effective option.</p> <p>For south-east Edinburgh the SESplan SEA stated that a lower number of total houses could have a minor negative impact and a higher total number could have a significant negative impact. However there is no mention of the long term impact of the Borders rail (a station at Shawfair is in this area) which will be operational by 2015, nor of the proposed tram route, which would be a long term development. These public transport links would have potential to lessen the impact of additional motorised journeys on the A720 and A1. The most appropriate conclusion for this SDA is that there will be mixed impacts, there is likely to be an increase in car journeys, which will affect already congested routes and increase emissions. However, there are measures to help mitigate this effect, although the</p>

		<p>precise impact cannot yet be quantified.</p> <p>West Edinburgh has excellent public transport links, with development already commenced on further improvements. It is considered that these links can significantly mitigate increased overall emissions from motorised journeys on routes which are congested, although it is difficult to quantify this precisely.</p> <p>Two areas in Edinburgh- Edinburgh North West (around Queensferry + Kirkliston) and Edinburgh South West (around Ratho, Juniper Green and Currie) are considered most likely to provide for the City of Edinburgh requirement for the Areas Outwith SDA, with a requirement of 2500 to be met. The Updated SSA states that the public transport links are very good in these areas and as a result a similar assessment to the West Edinburgh SDA is considered reasonable.</p> <p>Overall it is considered reasonable to identify that there are mixed impacts from the additional requirement, there will be increased motorised journeys and this brings the risk of negatively impacting air quality due to congestion and increased emissions. However there is significant work done to help mitigate the impact of emissions and it is hoped the usage of these measures will make a significant impact, particularly given the relatively short distances to employment, services and other destinations. Overall a neutral score is considered appropriate.</p>
<p><b>Biodiversity, flora &amp; fauna:</b> To avoid adverse effects on natural heritage assets of the SESplan area as a result of the location of additional or re-phased allocations</p>	0	<p>The assessment is judged to be neutral and this opinion is based on the Proposed Plan SEA and the updated SSA. Development is located away from designated areas, and the HRA will confirm there are no likely significant effects (LSE) on European sites, particularly to the North West where the Firth of Forth SPA is located (subject to LDP level HRA). There may be short-term impacts on the habitat network from development on greenfield land but the articulation of the CSGN in the respective areas may mitigate these.</p>
<p><b>Climatic Factors:</b> To minimise CO<sub>2</sub> emissions</p>	?	<p>It is considered there will be increased emissions because of construction (temporary) and car journeys (short-long term). The respective SDAs are</p>



<p>as a result of location of additional or re-phased allocations</p>		<p>located in highly accessible locations due to good public transport links, which will be improved by the Borders rail, the tram line and other rail network improvements. There is also significant potential for sustainable transport through existing cycle and other paths and continued development of the CSGN. These measures should help to mitigate climate change through encouraging modal shift from private cars onto public transport, which brings less total emissions or sustainable transport, which brings significantly less carbon emissions. The areas outwith SDA required bring uncertainty to the assessment, it is unknown where these will be located. As a result the balance of the assessment should be unknown.</p>
<p><b>Cultural Heritage:</b> To safeguard the built and historic environment from impacts as a result of additional or re-phased allocations</p>	<p><b>0</b></p>	<p>There are a number of garden and designed landscapes (GDL), Scheduled Monuments (SM), Conservation Areas and Listed Buildings located within the two SDAs and also in the areas to the north west and south east where the Outwith SDA requirement might be located. As a result it is considered almost certain that at least a part of the allocation of the requirement at the LDP level will impact on cultural heritage assets. It is difficult to provide a more detailed assessment but if a design-led approach, particularly to do with creating “distinctive places” is employed at a LDP level then it is considered that this will require assessment of the respective cultural heritage assets. In addition SESplan Policy 1B prevents significant adverse impacts on the integrity of international and national built or cultural heritage. On balance a neutral assessment is considered appropriate, because there is detail on what areas will be developed and therefore there is knowledge of what parts of the cultural heritage would be affected.</p>
<p><b>Landscape &amp; townscape:</b> To protect the landscape and townscape within the SESPlan area from impacts as a result of additional or re-phased allocations.</p>	<p><b>x</b></p>	<p>The SESplan SEA and updated SSA both raise the prospect of the loss of greenfield land on the surrounds of Edinburgh but conclude that this will not be significant. In South East Edinburgh additional allocations may be able to be accommodated alongside a planned community at Shawfair and this would consolidate the land lost to one location. At the West of Edinburgh a similar situation could occur, close to business locations and tram/rail services. In any scenario, design led development at a LDP level to build on the updated SSA findings will be important to establishing sustainable development from the additional allocations. However it is considered that</p>

		a minor negative impact is likely, particularly along the western side of Edinburgh when the three areas of additional/re-phased allocations are considered against the loss of greenbelt land.
<b>Material Assets:</b> To ensure sustainable location of additional or re-phased allocations regarding necessary infrastructure	<b>0</b>	The SESplan SEA states that development in the South East and West of Edinburgh will not bring negative effects: there is unlikely to be pressure on minerals required for development and waste can be dealt with by Edinburgh Council. It is considered that this assessment is still relevant even with additional allocations and the two areas outwith the SDAs. A design-led approach at LDP level could incorporate the need for/or accessibility to waste management facilities (such as recycling centres). As a result the assessment is neutral for all areas.
<b>Population &amp; human health:</b> To improve the quality of life and human health for communities in the SESplan area	✓	The assessment is judged to be positive. The SESplan SEA states that there will be a significant positive effect from housing in the South East and West of Edinburgh; however the alternative assessment, which looks at a higher growth scenario, is only assessed as neutral. It is considered appropriate to rank the assessment as positive because the majority of housing, even with the two areas outwith the SDA incorporated, will be located in areas that are accessible to public transport, services and greenspace. In addition there are relatively good transport links to the centre of Edinburgh, although the areas vary respectively, but also to areas further afield. The incorporation of a design led approach to masterplanning at a LDP level will consolidate the positive effect.
<b>Soil:</b> To minimise the impact on soil quality from impacts as a result of additional or re-phased allocations, and to adhere to contaminated land regulations	✘	The SESplan SEA identifies a residual negative effect for both Edinburgh areas because the development will primarily be on greenfield land and not on brownfield land. In addition the Updated SSA highlights that prime agricultural land will also be required to be used. Negative effects can be offset somewhat by the use of permeable construction materials, SUDS design and green infrastructure. However this would require policy direction at LDP level, as a result it is considered that the residual effect is minor negative
<b>Water:</b> To avoid creation of flood risk and adverse significant effects on water bodies from	<b>0</b>	The assessment is judged to be neutral. Edinburgh Local Development Plan work should mean that additional allocations will be located away from known areas of flood risk, however there will need to be cognisance of the risk of surface water flooding, particularly around the Gogarburn and River

impacts as a result of additional or re-phased allocations		Almond in West Edinburgh/ North West Edinburgh. Commitment to the relevant RBMP objectives; development of green infrastructure; the CSGN and further flood risk work at the LDP level should help to protect the water environment
--	--	---

**Table 2: East Lothian**

<b>Environmental Objectives</b>	<b>Potential impact of change to allocation and phasing on environmental objectives</b>	<b>Comments</b>
<b>Air:</b> To sustain current air quality levels	<b>x</b>	The SG puts forward an additional 2810 units. It is unclear at this stage where precisely the allocated land will be located within the Local Authority boundaries however it is judged that there is a risk of increased emissions from increased volume of motorised journeys on roads into Edinburgh and in Musselburgh, particularly due to the fact that these roads are congested. The Updated SSA finds that in general East Lothian is accessible by public transport methods; however there are capacity issues on the ECML. The outcome of the Berwick Local Rail Study, which would take passengers off the North Berwick line, is considered important to assist transport issues in the area. Overall the assessment is considered to be minor negative.
<b>Biodiversity, flora &amp; fauna:</b> To avoid adverse effects on natural heritage assets of the SESplan area as a result of the location of additional or re-phased allocations	<b>0</b>	The Updated SSA states that the only area within the East Lothian authority area that would likely be unsuitable for further allocations is the coastal area. This is considered beneficial to biodiversity due to the Firth of Forth SPA and the biodiversity potential the coastal area contains. The Updated SSA also seeks to avoid development which could affect other European sites, and this is confirmed by the HRA, which confirms no LSE on any European Sites (subject to LDP level HRA). However given the uncertainty over the location of development in the rest of the authority area as a precaution the assessment is neutral.
<b>Climatic Factors:</b> To minimise CO <sub>2</sub> emissions as a	<b>?</b>	The assessment of the housing potential in East Lothian is less certain because of the wide geographical area where housing may be

<p>result of location of additional or re-phased allocations</p>		<p>located. There is adaptation to climate change built in because the Updated SSA states there will be no additional allocations located at the coast and this therefore avoids future issues to do with sea level rises, coastal erosion and more severe coastal flooding. However soil erosion in greenfield areas as a result of housing development would be a risk as there is limited supply of brownfield land. It is likely that climate change mitigation will be provided by locating housing in areas accessible to public transport or sustainable transport links, incorporating links to the continued development of the CSGN. These measures should help mitigate climate change through a reduction in greenhouse gas emissions. However, there is already congestion on routes into Edinburgh from East Lothian and it is likely that more housing will exacerbate this and this brings the potential for negative effects. Due to the uncertainty over the location of the additional housing requirement the assessment should be unknown.</p>
<p><b>Cultural Heritage:</b> To safeguard the built and historic environment from impacts as a result of additional or re-phased allocations</p>	<p>?</p>	<p>The assessment is unknown. It is almost certain that cultural heritage assets will be affected to some degree by development of the housing requirement but the lack of detail on precise locations is not available and even with the application of a design-led approach, and a focus on “distinctive places” and SESplan Policy 1B, which prevents significant adverse impacts on Cultural Heritage, the large size of the SDA means that on balance an unknown assessment is appropriate.</p>
<p><b>Landscape &amp; townscape:</b> To protect the landscape and townscape within the SESPlan area from impacts as a result of additional or re-phased allocations.</p>	<p>?</p>	<p>Due to the uncertainty of the precise location of the additional allocations a number of scenarios are possible. The fact that additional development should be steered away from the coast is a positive, as the setting of towns and villages in this area can be protected. However, there is still significant potential for adverse significant effects in other areas, particularly settlements that bring a sense of place and character to East Lothian, and on areas of land designated green belt to the west of the Local Authority area. It is considered that whatever scenario is decided a design-led approach, incorporating masterplanning exercises would be the best mitigation to avoid adverse significant effects.</p>
<p><b>Material Assets:</b></p>	<p>?</p>	<p>Again the precise impact on the SEA topic cannot be established</p>

To ensure sustainable location of additional or re-phased allocations regarding necessary infrastructure		because of the uncertainty over precise locations of allocations. There are existing mine workings which could be redeveloped and if this was to occur further extraction would not be possible. It is also possible that transport infrastructure would require examined, particularly where roads are at capacity in the west of the Local Authority area.
<b>Population &amp; human health:</b> To improve the quality of life and human health for communities in the SESplan area	<b>0</b>	It is considered that there is uncertainty over the transport links into Edinburgh, with the potential for congestion possibly negating the benefits of the strategic location East Lothian has with regards to Edinburgh. However, East Lothian is an attractive area to live with excellent recreation potential. As a result the assessment is neutral.
<b>Soil:</b> To minimise the impact on soil quality from impacts as a result of additional or re-phased allocations, and to adhere to contaminated land regulations	<b>x</b>	The SESplan SEA identifies that East Lothian has limited brownfield land available for redevelopment and therefore allocations are likely to be on greenfield land where soil sealing is a risk. In addition the Updated SSA recognises that there will be a loss of prime agricultural land. It is judged that permeable construction, SUDS design and promotion of green infrastructure can lessen the impacts identified. However a negative impact on soil quality is still anticipated.
<b>Water:</b> To avoid creation of flood risk and adverse significant effects on water bodies from impacts as a result of additional or re-phased allocations	<b>0</b>	Even without knowing the exact location of additional and re-phased allocations it is considered that Local Development Plan work will avoid areas of known flood risk. In addition existing legislation and policy which seeks to promote and protect the water environment will help to avoid negative effects. As a result the assessment is judged to be neutral.

**Table 3: Fife**

<b>Environmental Objectives</b>	<b>Potential impact of change to allocation and phasing on environmental objectives</b>	<b>Comments</b>
<b>Air:</b>	<b>x</b>	The SG puts forward an additional 2130 units in the North

<p>To sustain current air quality levels</p>		<p>Dunfermline SDA and 2720 units in the Ore/Upper Leven Valley SDA Both of these areas are considered to be highly accessible by sustainable transport but also by car (as identified in the Updated SSA). In addition a further 1150 units in areas outwith the two SDAs are also proposed, a precise location for these units has not been provided as yet however it is likely they would generate additional motorised journeys to some degree, particularly given the distance to Edinburgh, and employment, services and other destinations. As a result the most objective assessment is considered to be minor negative.</p>
<p><b>Biodiversity, flora &amp; fauna:</b> To avoid adverse effects on natural heritage assets of the SESplan area as a result of the location of additional or re-phased allocations</p>	<p>0</p>	<p>The HRA concludes no r LSE on European Sites (subject to LDP level HRA) across all areas. There may be some impact on habitat networks from development on greenfield land; however it is considered that work to develop the CSGN, and to provide additional open space, may mitigate this. As a result it is considered that a neutral assessment is appropriate.</p>
<p><b>Climatic Factors:</b> To minimise CO<sub>2</sub> emissions as a result of location of additional or re-phased allocations</p>	<p>?</p>	<p>The two SDA are located in areas where coastal erosion, sea level rise and flood risk will not be issues and therefore adaptation to climate change is built in. However, the areas outwith SDA bring greater potential that flood risk could be an issues, particularly more severe coastal and inland flooding associated with climate change. Fife generally has areas available for regeneration; this is beneficial to climate change mitigation in that development can be targeted to brownfield areas, and to adaptation, as there is less risk of soil erosion and loss of prime agricultural land due to the need to meet the housing requirement. The Updated SSA states that the two SDA have good public transport links and spare rail capacity, this should help mitigation through reducing carbon emissions associated with modal transport. However, it is still likely that emissions would increase due to increased car and public transport journeys. There is uncertainty over the impact of the areas outwith SDA and as a result, the balance of the overall assessment should be unknown.</p>
<p><b>Cultural Heritage:</b> To safeguard the built and historic</p>	<p>?</p>	<p>The assessment is unknown. As previously described the lack of detail of precisely where the housing will be located makes it too</p>

environment from impacts as a result of additional or re-phased allocations		difficult to apply a precise assessment (negative or positive) despite measures which bring significant potential for prevention and mitigation of a negative impact, because it is unknown what cultural heritage assets will be affected.
<b>Landscape &amp; townscape:</b> To protect the landscape and townscape within the SESPlan area from impacts as a result of additional or re-phased allocations.	?	The Updated SSA ensures that the two SDA where the additional allocations will be located are away from the AGLV designated in Fife. However no guarantee can be provided for the Areas Outwith SDA. A similar scenario is envisaged for south Dunfermline, where a greenbelt is proposed. The setting of towns in the respective SDAs is an important consideration. The development of the additional allocations will need to be backed by design-led masterplanning work, which takes into account the setting and character of these settlements. Overall the assessment is considered to be unknown due to the lack of precise location for the Areas Outwith the SDA.
<b>Material Assets:</b> To ensure sustainable location of additional or re-phased allocations regarding necessary infrastructure	0	The SESplan SEA findings, which state that there is the possibility of a minor negative effect due to the history of the area for mine workings, are relevant when considered against additional allocations across Fife and this may bring a minor negative impact. However it is now considered that with careful, design-led masterplanning work that the benefits of regeneration of the area can be achieved and any mineral workings where extraction may still be possible can be avoided. As a result the assessment is neutral.
<b>Population &amp; human health:</b> To improve the quality of life and human health for communities in the SESplan area	✓✓	The Updated SSA states that the Ore/Leven Valley SDA scores particularly well for regeneration potential and there is longer term work which has identified this area for future growth, regeneration and environmental improvement. The North Dunfermline SDA is considered particularly accessible and scores relatively well elsewhere in the assessment. It is not considered that the uncertainty of the Areas Outwith SDA necessarily changes the assessment for this SEA topic and as a result it is considered to be significantly positive.
<b>Soil:</b> To minimise the impact on soil quality from impacts as a result of	0	The assessment is neutral. It is considered that there should not be significant impacts on the soil resource from additional housing allocations due to the fact that Fife has a large supply of brownfield

additional or re-phased allocations, and to adhere to contaminated land regulations		land that can be redeveloped.
<b>Water:</b> To avoid creation of flood risk and adverse significant effects on water bodies from impacts as a result of additional or re-phased allocations	<b>0</b>	There are areas of flooding identified on SEPA's flood extent map within the two SDA and between them and any increased risk will need to be avoided by work at LDP level. The water quality in the area is generally poor or moderate according to SEPA, and additional allocations will need to ensure this water quality level is not exacerbated in line with RBMP objectives. Overall it is considered there is a neutral impact as a result of the additional allocations, despite the uncertainty of the Areas Outwith SDA, as LDP work should be able to mitigate the identified impacts.

**Table 4: Midlothian**

<b>Environmental Objectives</b>	<b>Potential impact of change to allocation and phasing on environmental objectives</b>	<b>Comments</b>
<b>Air:</b> To sustain current air quality levels	<b>0</b>	Additional allocations are located in the A7/A68/Borders Rail Corridor (100 units). It is not considered that this figure would significantly affect air quality, particularly given public and sustainable transport options, and the development of the Borders rail, which should combine to lessen the impact of carbon emissions from motorised transport. However, development should avoid exacerbating the existing poor air quality around Pathhead and it is recognised that congestion on routes into Edinburgh is a significant issue. Overall however a neutral assessment is considered appropriate.
<b>Biodiversity, flora &amp; fauna:</b> To avoid adverse effects on natural heritage assets of the SESplan area as a result of the	<b>0</b>	The assessment is neutral. It is considered that the areas where the additional allocations are likely to be placed are largely already affected by development and that the Updated SSA ensures the areas of land allocated are away from designated land. Local authority



location of additional or re-phased allocations		policy frameworks will also help prevent any negative impacts on designated natural heritage assets. Continued development of the CSGN and provision of open space accessible to allocations should help to mitigate any disturbance of habitat networks.
<b>Climatic Factors:</b> To minimise CO <sub>2</sub> emissions as a result of location of additional or re-phased allocations	<b>x</b>	The additional allocations in the A7/A68/Borders rail corridor may bring some potential to exacerbate congestion on routes into Edinburgh, however there are both public and sustainable transport options, which will be bolstered by the Borders Railway, and these help mitigate climate change by reducing carbon emissions. The land for the additional 100 units will likely need to be on greenfield/prime agricultural land and this brings the risk of soil erosion and loss of productive land which are negative in terms of adaptation to climate change. Where there is potential soil erosion, associated exacerbation of flood risk could be an issue. It is noted that Midlothian Council have undertaken a SFRA as a part of the production of their LDP and this considers climate change impacts. On balance it is considered that the assessment is minor negative.
<b>Cultural Heritage:</b> To safeguard the built and historic environment from impacts as a result of additional or re-phased allocations	<b>0</b>	It is considered that the limited housing requirement identified in the SG and the combination of Policy 1B, which prevents significant impacts on cultural heritage and the development of distinctive places in line with a design-led approach at the LDP level would allow for a neutral impact despite the uncertainty over where in the SDAs development would actually occur
<b>Landscape &amp; townscape:</b> To protect the landscape and townscape within the SESPlan area from impacts as a result of additional or re-phased allocations.	<b>0</b>	The SESplan SEA identifies that there are numerous AGLVs throughout Midlothian and negative effects from the additional allocations are possible. Nonetheless, longer term areas for expansion have already been identified with minimal impact on these landscape designations. The Updated SSA has considered the landscape in assessing the potential for additional and re-phased allocations and it is concluded that the A7/A68/Borders Rail Corridor SDA has capacity. At a LDP level, it is considered a design-led approach; incorporating masterplans of parcels of land for development would help to avoid adverse effects on the setting of settlements located in the SDA. As a result a neutral assessment is

		considered appropriate.
<b>Material Assets:</b> To ensure sustainable location of additional or re-phased allocations regarding necessary infrastructure	0	The assessment is judged to be neutral. The SESplan SEA states that development in the relevant Midlothian SDA will not bring negative effects: there is unlikely to be pressure on minerals required for development and waste can be dealt with by Midlothian Council. It is considered that this assessment is still relevant even with additional allocations in the A7/A68/Borders Rail Corridor.
<b>Population &amp; human health:</b> To improve the quality of life and human health for communities in the SESplan area	✓	The assessment is positive. Additional allocations will encourage development in areas that already provide employment, services and are on the transport network through Midlothian, most specifically the Borders Rail. Additional development should also provide affordable housing and enhanced greenspace.
<b>Soil:</b> To minimise the impact on soil quality from impacts as a result of additional or re-phased allocations, and to adhere to contaminated land regulations	x	The SESplan SEA identifies a minor negative effect because of the fact some development will be on greenfield land and soil sealing is therefore a risk. This assessment is considered to be relevant to the additional allocations. It is not considered that there is a significant change as it is unclear how much additional land to that already assessed will be on greenfield land and how much on brownfield land. It is the case that LDPs could encourage permeable construction, SUDS design, and the incorporation of green infrastructure.
<b>Water:</b> To avoid creation of flood risk and adverse significant effects on water bodies from impacts as a result of additional or re-phased allocations	0	It is generally considered that there is scope for development in the A7/A68/Borders Rail Corridor that would avoid adverse significant effects on the water environment, and which does not result in flood risk, and that therefore a neutral assessment is appropriate. Nonetheless there will require to be work at LDP level to ensure that the water environment is not adversely affected, and that flood risk is avoided.

**Table 5: Scottish Borders**

Environmental Objectives	Potential impact of change to allocation and phasing on environmental objectives	Comments
<p><b>Air:</b> To sustain current air quality levels</p>	<p><b>0</b></p>	<p>The additional and re-phased allocations for the respective Borders SDAs- 110 in the Eastern Borders; 85 in the Central Borders; and 5 in the Western Borders, and 30 units outwith these SDAs, are considered to be limited in scale, especially given the size of the SDAs. The Borders has no areas that are close to AQMA designation, however car journeys are necessary due to the rural nature of the authority and limited public transport links, therefore it is recognised that this is a source of carbon emissions. The Borders Rail brings the potential for less car journeys particularly for the Central Borders SDA where the majority of the additional/re-phased housing is located and this may mitigate carbon emissions, although the degree to which this is the case is unknown. A rail stop at Reston could have a similar effect for the Eastern Borders, although again the extent of this is unknown.</p> <p>The Borders Proposed LDP has been subject to SEA and the allocations (which include the additional requirement identified in the SG) have been assessed as to their impact on the Air SEA topic. No negative impacts were found largely because of the proximity of the allocations to town centres and sustainable transport links. It was also considered that the limited size of the allocations and the high air quality were pertinent factors</p>
<p><b>Biodiversity, flora &amp; fauna:</b> To avoid adverse effects on natural heritage assets of the SESplan area as a result of the location of additional or re-phased allocations</p>	<p><b>0</b></p>	<p>The Borders has a high quality natural environment with a number of designations, particularly the River Tweed SAC, which is present in all three SDAs. The Updated SSA ensures that no housing sites will be located on designated natural heritage sites, and in addition there are significant local policies and initiatives which help to protect the natural environment in the Borders. The possibility of LSE from</p>

		additional allocations of housing on designated sites in the Borders remains however and an HRA will be required to examine this further. The HRA findings when combined with the Borders LDP HRA mean that there will be no LSE on the conservation objectives of European Sites
<b>Climatic Factors:</b> To minimise CO <sub>2</sub> emissions as a result of location of additional or re-phased allocations	<b>0</b>	The additional requirement is very limited in the Borders. Allocations are located away from the coastline and from areas of known flood risk, in addition Borders Council have undertaken a SFRA. As a result it is considered that adaptation to climate change in terms of flood risk is built in. Allocation of land is a mixture between brownfield, mixed use allocations, which help to mitigate climate change through reducing the impact of transport and efficient resource use, and limited loss of prime agricultural land, which in the future may have an impact on food security and soil erosion, which brings a negative impact on climate change adaptation. On balance the assessment of neutral is considered appropriate.
<b>Cultural Heritage:</b> To safeguard the built and historic environment from impacts as a result of additional or re-phased allocations	<b>0</b>	The assessment is neutral. There is a difference in the assessment for the Scottish Borders to the other Local Authorities because the additional allocations are already worked into the Proposed Local Development Plan and therefore it is known that where there are impacts on cultural heritage assets that mitigation has been provided.
<b>Landscape &amp; townscape:</b> To protect the landscape and townscape within the SESPlan area from impacts as a result of additional or re-phased allocations.	<b>0</b>	Although the Borders has a high quality landscape, shown in the designation of the two NSA, it is considered that this limited increase in allocations will not significantly affect landscapes or townscapes of the Borders. Again a design-led approach at the LDP level to the promotion of allocations will help to ensure that the landscape and character of Borders towns is integral to the development that results.
<b>Material Assets:</b> To ensure sustainable location of additional or re-phased allocations regarding necessary infrastructure	<b>0</b>	It is considered the limited additional allocations do not result in increased pressure on mineral resources, or any land required for the production of these resources, or infrastructure requirements needed to support the allocations, however some work requiring assets would be required and as a result the assessment is neutral.
<b>Population &amp; human health:</b> To improve the quality of life and	✓	The assessment is positive. Additional allocations will largely encourage development in areas that already provide employment,

<p>human health for communities in the SESplan area</p>		<p>services and are on the transport network, most specifically the Borders Rail. Additional development should also provide affordable housing, enhanced open space and links to sustainable transport networks. There is a requirement to ensure that areas outwith the central Borders also experience the benefits of sustainable development that the Central Borders does, particularly from the Borders Railway.</p>
<p><b>Soil:</b> To minimise the impact on soil quality from impacts as a result of additional or re-phased allocations, and to adhere to contaminated land regulations</p>	<p><b>0</b></p>	<p>The assessment is neutral. The Borders has a degree of brownfield land which has potential for redevelopment and due to the limited nature of the additional allocations the pressure on greenfield and prime agricultural land should not be significant.</p>
<p><b>Water:</b> To avoid creation of flood risk and adverse significant effects on water bodies from impacts as a result of additional or re-phased allocations</p>	<p><b>0</b></p>	<p>The Borders water environment, focussed on the River Tweed which is subject to a River Basin Management Plan, is highly important. As a result there is potential for adverse impacts from additional allocations; however the scale of these allocations, when considered against possible impacts, is limited and the water environment is tightly managed and has a significant policy and legislation framework which prevents adverse impacts. The Scottish Borders Proposed LDP is at the Period of Representations and the SEA concludes a neutral impact on the Water environment, this is relevant because the Proposed LDP includes additional allocations and re-phasing as proposed in the SG. As a result a neutral assessment is considered appropriate in this SEA.</p>

**Table 6: West Lothian**

Environmental Objectives	Potential impact of change to allocation and phasing on environmental objectives	Comments
<p><b>Air:</b> To sustain current air quality levels</p>	<p><b>0</b></p>	<p>The additional allowance is for 375 houses and this is considered to be a limited amount given the size of the SDA. There is uncertainty as to where precisely the housing will be located and this makes the assessment more complex. However, it is considered that the SESplan SEA, which stated that it was unlikely there would be effects on air quality due to the existing public transport links to Edinburgh and Glasgow, and the promotion of sustainable transport links such as the CSGN is still relevant to this assessment. Although it should be recognised that there is congestion on routes into Edinburgh and there is potential that inappropriately sited housing could increase emissions. Overall it is judged that the additional allocations will not lead to significant change to the existing neutral assessment from the Updated Environmental Report for SESplan.</p>
<p><b>Biodiversity, flora &amp; fauna:</b> To avoid adverse effects on natural heritage assets of the SESplan area as a result of the location of additional or re-phased allocations</p>	<p><b>0</b></p>	<p>The Updated SSA and LDP policy will ensure no development is located on or adjacent to designated nature sites, for European Sites the HRA confirms no LSE on the conservation objectives of European Sites (subject to LDP level HRA). It is considered that there may be impacts on habitat networks from limited development on greenfield land; however the provision of open space and the continued development of the CSGN to provide additional habitat will assist in mitigating these. As a result the assessment is neutral.</p>
<p><b>Climatic Factors:</b> To minimise CO<sub>2</sub> emissions as a result of location of additional or re-phased allocations</p>	<p><b>?</b></p>	<p>The limited additional requirement given the size of the SDA is considered relevant to assessment of this topic. Generally it is expected the requirement would be met away from the coast and therefore adaptation is built in by removing coastal climate change issues. However, there is a risk of increased inland flooding issues and at this time it is unclear what the West Lothian LDP process will do to avoid this risk, there is no SFRA undertaken at this time. West Lothian has excellent public and sustainable transport links, with the</p>

		addition of the tram lines and continued development of the CSGN giving potential to bolster these links. As a result there is the potential to mitigate carbon emissions from private car journeys to a significant degree. On balance the assessment must be unknown because of the uncertainty over where the additional requirement will be located and the lack of information on flood risk.
<b>Cultural Heritage:</b> To safeguard the built and historic environment from impacts as a result of additional or re-phased allocations	?	The assessment is unknown. West Lothian is a large SDA and the size makes an objective assessment very difficult, even with the mitigation and prevention of a design-led approach at the LDP level, and Policy 1B of SESplan which prevents significant adverse impacts.
<b>Landscape &amp; townscape:</b> To protect the landscape and townscape within the SESplan area from impacts as a result of additional or re-phased allocations.	0	Although development of additional allocations would bring the potential to improve the townscapes of West Lothian towns though regeneration of brownfield land, it is also considered there may be negative impacts from development on greenfield land and the possibility of impacts on AGLV to the north and west of West Lothian. A design-led approach to masterplanning the additional allocations at a LDP level would help to mitigate any negative impacts. As a result the assessment is neutral.
<b>Material Assets:</b> To ensure sustainable location of additional or re-phased allocations regarding necessary infrastructure	0	The SESplan SEA stated that although a negative impact was unlikely, that the area is rich in mineral deposits and that there was a risk that development may prevent their extraction. However with a design led approach and further LDP work identifying mineral resources then negative impacts could be mitigated as a result the assessment is neutral.
<b>Population &amp; human health:</b> To improve the quality of life and human health for communities in the SESplan area	✓✓	It is considered that the additional allocations, as informed by the Updated SSA, will be located in an area which is highly accessible to public transport, services and open space. In addition there are excellent links to areas further afield, due to the rail-line, Edinburgh airport and the Forth Road Bridge. There is also the likelihood of significant regeneration. As a result the assessment impact is considered to be significantly positive.
<b>Soil:</b> To minimise the impact on soil	x	The SESplan SEA identifies a negative effect because of the fact development will be on greenfield land and soil sealing is therefore a

<p>quality from impacts as a result of additional or re-phased allocations, and to adhere to contaminated land regulations</p>		<p>risk. This assessment is considered to be relevant to the additional allocations and re-phasing of housing land as it is likely that further greenfield land would be required to meet the development potential of the additional allocations. There would be the possibility of introducing mitigation through permeable construction, SUDS design and green infrastructure at a LDP level.</p>
<p><b>Water:</b> To avoid creation of flood risk and adverse significant effects on water bodies from impacts as a result of additional or re-phased allocations</p>	<p><b>0</b></p>	<p>The SEPA flooding map shows that there are areas of flooding within the SDA and work would be required at LDP level to ensure development of allocations did not exacerbate this flood risk. In addition there are important parts of the water environment, such as the River Almond and Union Canal, which would require protection and enhancement in line with the Scotland RBMP objectives. Overall the assessment is considered to be minor negative as the lack of precise detail on where the additional allocations will be located means that negative effects could arise on either flooding or the water environment.</p>







**Summary of SESplan Draft Housing SG Environmental Report Responses**

<b>Respondent: SNH</b>		
<b>Summary of response received</b>	<b>SESplan response</b>	<b>Action to be taken</b>
<p><u>Design Led Approach: strategic approach</u></p> <p>The SG should set the strategic principles for the design-led approach in the SESplan area, setting the framework for further local and site specific detail in LDPs. Paragraph 36 of the draft revised SPP is clear that this is an ‘all levels’ approach to placemaking</p>	<p>Development principles are already set and approved in Policy 1B of SESplan. In addition, Policy 5 of SESplan states “Supplementary guidance will be prepared to provide detailed further information for Local Development Plans as to how much of that requirement should be met in each of those six areas, both in the period 2009-2019 and...2019-2024”. The Draft SG on housing land therefore has a tight focus to provide additional information in support of SESplan policy 5 (Housing Land). As a result the document is purely concerned with the housing needs and demand of the SESplan area. It is considered changes to strategic level policy, such as the design-led approach, which is an emerging requirement in Scottish Planning Policy 2, should be discussed for inclusion in SESplan 2 and/or LDPs.</p>	<p>Development of the design-led approach should be discussed for inclusion in SESplan 2 and/or LDPs.</p>
<p><u>Central Scotland Green Network</u></p> <p>ER notes under such topics as ‘Air/Climatic factors’ could be addressed by “locating these areas <u>close</u> to the CSGN” This is a slightly misleading proposal as the component local authority areas (excluding Scottish Borders) are <u>within</u> the CSGN. We believe that what is meant</p>	<p>It is agreed that the wording can be changed in the updated Environmental Report to reflect allocations being “associated with strategic and local green networks within the CSGN area”</p>	<p>Insert the changes as described under the SESplan response column at the appropriate places in the Updated Environmental Report</p>

<p>here is that allocations should be associated with strategic and local green networks within the CSGN area</p>		
<p><u>SEA Objectives: Biodiversity</u></p> <ul style="list-style-type: none"> <li>- The CSGN work plan is identified as a whole...we suggest that milestones and actions under work plan item 'A5 A Place for Nature' are most relevant.</li> <li>- SNH site condition monitoring only covers SSSI, very few of which are in locations likely to be impacted by development pressures. This does not therefore form a useful tool for monitoring SESplan...Local Biodiversity and Geodiversity (LBS and LGS) are more likely to be affected by development pressures, as are European Protected Species (EPS). Monitoring these, along with developments involving woodland loss may give a more useful indication of how development pressures are affecting biodiversity</li> <li>- while ancient woodland designations themselves will inform monitoring of loss, a more complete understanding of woodland change could be achieved by referring to the Native Woodland Survey of Scotland (NWSS)</li> </ul>	<ul style="list-style-type: none"> <li>- Agreed that the CSGN work plan reference should be changed</li> <li>- It is considered that the uncertainty over the precise location of housing means that it is worthwhile keeping site condition monitoring in. It is accepted that monitoring of LBS and LGS, as well as European Species, would be appropriate to add.</li> <li>- It is considered that ancient woodland could be added to by incorporating the Forestry Commission NWSS into the monitoring framework</li> </ul>	<ul style="list-style-type: none"> <li>- Incorporate a change to refer to work plan item 'A5 A Place for Nature' over the whole CSGN work plan within the Updated Environmental Report</li> <li>- Keep site condition monitoring in the Updated Environmental Report and add monitoring of LBS, LGS and European Species</li> <li>- Add the NWSS into the monitoring framework</li> </ul>
<p><u>SEA Objective: Climatic Factors</u></p> <p>AS the CO<sub>2</sub> emissions for the transport sub-objective are linked to public transport, and presumably also to active travel, it may also be</p>	<ul style="list-style-type: none"> <li>- It appears from examination of the cycle counters proposal that only one location in Edinburgh has the counters deployed</li> </ul>	<ul style="list-style-type: none"> <li>- Incorporate SEStran mode share targets and region wide measures into Table 5 SEA Objectives</li> </ul>

<p>useful to monitor this objective by modal share. Sustrans has recently announced 'Danish-style' cycle counters for Scotland which may assist this monitoring</p>	<p>and therefore it is not an adequate monitor for the SESplan area.</p> <ul style="list-style-type: none"> <li>- However it is considered that SEStran mode share targets and region wide measures would be appropriate monitoring data</li> </ul>	
<p><u>SEA objectives: Landscape and Townscape</u></p> <ul style="list-style-type: none"> <li>- As the SEA proposes applying the design-led approach as a means of mitigating impacts, the monitoring proposals under this topic should be reviewed. It may be useful to consider the six qualities of positive placemaking set out in paragraph 37 of the draft revised SPP</li> <li>- Monitoring via landscape review documents and conservation area statements provide information on a point in time on specific areas. As the SEA objective is to '...protect the landscape and townscape within the SESplan area...' the monitoring should take a wider scope, including the Edinburgh green belt</li> </ul>	<ul style="list-style-type: none"> <li>- It is considered more effective to monitor through reference to the entire design rather than trying to monitor through 6 separate elements. It is noted that p50 of the Policy Statement on Architecture and Place refers to the development of a Place Standard Assessment tool which could be used to monitor design in the SESplan area in the future.</li> <li>- In addition there is also reference to a Masterplanning toolkit for design in town centres. This could also be used to monitor development in SESplan town centres in the future.</li> <li>- It is considered that Local Authority landscape review documents and conservation area statements are the best gauge to monitor protection of the designated landscape and settlements. These documents are reviewed and could include greenbelt and other types of designation</li> </ul>	<ul style="list-style-type: none"> <li>- No action necessary for the Updated Environmental Report</li> <li>- SESplan2 should be aware of ongoing work on design as a result of the Policy Statement on Architecture and Place.</li> </ul>

<p><u>SEA objectives: Population and Human Health</u></p> <p>The monitoring for sub-objectives related to access to greenspace and footpath and cycle routes is based on provision and distance to these. While this is relevant to the sub-objective, the omission of access from the monitoring criteria could mean that the sub-objective is not met. For example, a new development may be a nominal distance from a green network but that benefit is reduced if it is not also accessible</p>	<ul style="list-style-type: none"> <li>- It is agreed that a change to the monitoring criteria is necessary to reflect accessibility to usable designated open space and/or the green network</li> </ul>	<ul style="list-style-type: none"> <li>- Change the monitoring for Population and Human Health to read Accessibility to designated green network and/or open space</li> </ul>
<p><u>SEA objectives: Soil</u></p> <ul style="list-style-type: none"> <li>- The use of Urban Capacity Studies...is a little unclear. Para 8.1 emphasises the focus of Urban Capacity Studies on previously developed land. As the other monitoring tools are vacant and derelict land and areas of contaminated land, there could be a substantial overlap in scope of monitoring.</li> <li>- The scope of monitoring also omits the loss of prime agricultural land and peat-rich soils to additional allocations as the focus is on previously developed, windfall sites</li> </ul>	<ul style="list-style-type: none"> <li>- Vacant and derelict land audits do feed into urban capacity studies however it is considered there is merit in having both as monitoring tools as ultimately the two processes can provide different information</li> <li>- Monitoring of the loss of prime agricultural land and peat-rich soils should be added</li> </ul>	<ul style="list-style-type: none"> <li>- No change required for the Updated Environmental Report</li> <li>- Insert land capability for agriculture classification maps and peat rich soil maps</li> </ul>
<p><u>Assessment findings</u></p> <p>para 4.8 states that the assessment for Biodiversity, flora and fauna is neutral, noting that an HRA will be required to further assess any implications for European Sites. As this work is to be completed, the assessment at this point</p>	<ul style="list-style-type: none"> <li>- The HRA is now at a stage where it has been asserted that there will be no likely significant effects on the site integrity of any European Site as a result of the proposals in the Draft SG. The neutral</li> </ul>	<ul style="list-style-type: none"> <li>- Update the wording at Para 4.8 and other appropriate parts of the document</li> </ul>

<p>should...concluded that impacts are unknown</p>	<p>assessment is considered appropriate, given a wording update at para 4.8 to reflect the HRA progress</p>	
<p><u>Measures envisaged for prevention, reduction and offsetting significant adverse effects:</u> <u>Air/Climatic Factors</u></p> <p>“There should be consideration of measures to alleviate pressure at key routes into/around Edinburgh” is not itself a measure that will reduce/prevent/offset. Instead, we suggest that this measure is linked into the move towards sustainable transport and modal shift to public transport and active travel.</p>	<ul style="list-style-type: none"> <li>- This statement should be better articulated to link towards sustainable transport and modal shift as suggested</li> </ul>	<ul style="list-style-type: none"> <li>- Alter Table 7 ‘Measures to reduce/prevent/offset’ for the Soil SEA topic to state ‘measures to promote modal shift to sustainable transport and the development of sustainable transport routes and infrastructure should be promoted</li> </ul>
<p><u>Measures envisaged for prevention, reduction and offsetting significant adverse effects:</u> <u>Landscape and Townscape</u></p> <ul style="list-style-type: none"> <li>- “The SSA should prevent development being located where there is the risk of adverse effects on landscape designations” is a reasonable measure to include...however...this measure should be widened to include adverse effects on landscape and settlement setting</li> <li>- “Allocation of land should be guided by a</li> </ul>	<ul style="list-style-type: none"> <li>- The statement in the Measures to reduce/prevent/offset column could be widened to better reflect the ‘Issue Identified’ column of Table 7 in the Environmental Report which states “development of additional allocations on greenfield land on the setting and surrounds of settlements in the SESplan area</li> <li>- The wording should be better articulated</li> </ul>	<ul style="list-style-type: none"> <li>- Incorporate the wording “wider landscape and settlement setting” into the Landscape &amp; townscape row and Measures to reduce/prevent/offset column</li> <li>- Change the wording to state “Allocation</li> </ul>



<p>design-led approach i.e. landscape character/landscape capacity studies/masterplanning/development frameworks' sets out the process but does not consider 'how' the design-led approach will help to reduce/prevent/offset the impact of additional allocations. Of the positive placemaking qualities set out in relation to the design-led approach in the draft revised SPP, 'Distinctive' will be particularly important in achieving this measure. This quality included design of places that complement local landscapes, topography, ecology and natural features</p>	<p>to reflect how impacts of development of additional allocations on the setting and surrounds of settlements should have a positive impact.</p>	<p>of land should provide places that are distinctive, in line with the Designing Places document, in that they positively respond to the wider landscape context in which they are situated"</p>
<p><u>Appendix 2 Relevant Plans, Policies and Strategies</u></p> <p>...include Scottish Government's 'Creating Places' policy statement in this Appendix</p>	<p>- The document can be added to the Appendix</p>	<p>- Add the document to the appendix</p>
<p><b>Respondent: SEPA</b></p>		
<p><u>Flood Risk and Water Management</u></p> <ul style="list-style-type: none"> <li>- There is a risk of flooding in the SESplan area from surface water, in itself or in combination with other sources of flood risk. Sec 4...neatly identifies single issues associated with flood risk and water management. The SG could usefully be developed to explore these issues more fully</li> <li>- "Overall it is considered that although there is the potential for negative impacts, it must be considered that legislation and Local Authority work at the LDP level will prevent</li> </ul>	<ul style="list-style-type: none"> <li>- It is assumed that "single issues" refers to each Table for the respective SDAs, which discuss impacts on the water environment from flood risk and management and that the statement "The SG could usefully be developed to explore these issues more fully" is closely aligned to the following point related to an SFRA for the SESplan area.</li> <li>- It is considered unlikely that the allowances in the SDAs will lead to</li> </ul>	<ul style="list-style-type: none"> <li>- No action with regards to the Draft SG but identification of a possible need for further discussion regarding SESplan wide flood risk work for SESplan 2</li> </ul>

<p>negative impacts occurring”. We would question the assumptions that lead to this conclusion...We have advised on the need for a SFRA to inform the Plan and the SEA...It remains our concern that allocations made in the absence of a SFRA, SESplan could allocate land in local authority planning areas which the LDP may not be able to deliver because of the need to avoid flood risk...this raises questions over the effectiveness of the SG, the effectiveness of SESplan</p> <ul style="list-style-type: none"> <li>- Para 4.18 (soil sealing from development on greenfield land)...It is our view that especially where the SG allocates strategic development sites that the ER should identify opportunities for strategic mitigation for the loss of land to ‘soak up’ water. Such opportunities include identifying compensatory storage opportunities in the development of the CSGN and the need and opportunities to develop strategic SUDS...</li> </ul>	<p>exacerbation of flood risk either where development takes place or elsewhere as the precise location of the housing within the SDA will be decided by local authorities and they will undertake appropriate flood risk analysis. Work on LDPs, including flood risk work, has informed the setting of the housing requirements in the Supplementary Guidance. This is why the assessment was decided to be neutral.</p> <ul style="list-style-type: none"> <li>- The SG does not allocate “strategic development sites” as suggested nor does it contain the required level of detail to allow for the identification of opportunities for strategic mitigation for the loss of land to ‘soak up’ water in terms of particular sites. This would need to be done at LDP level, which is in line with Policies 11 ‘Delivering the Green Network’ and 15 ‘Water and Flooding’ in the approved Strategic Development Plan. However text could be added to Table 7 Measures envisaged for the prevention, reduction &amp; offsetting of any significant adverse effects</li> </ul>	<ul style="list-style-type: none"> <li>- Insert row into Table 7 under SEA Topic ‘Water’ and under ‘Issues Identified’ add “Soil sealing within the SESplan region due to the development of greenfield land and impact on flooding incidents through run-off and loss of soak away land”, under ‘Measures to reduce/prevent/offset’ add “identification of compensatory storage opportunities; identification of areas of strategic SUDS areas including within the CSGN; and identification of vulnerable areas”</li> </ul>
<p><u>Soil</u></p> <p>Para 4.14 (mitigation measures of impacts on the Soil SEA topic)...We would like this ER, however, to consider options for a SDP scale of strategic mitigation. This could simply be to identify sites</p>	<ul style="list-style-type: none"> <li>- Policy 5 of SESplan states that “Supplementary guidance will be prepared to provide detailed further information for Local Development Plans</li> </ul>	<ul style="list-style-type: none"> <li>- No action in the Updated Environmental Report to do with identifying large scale strategic greenfield sites. As it is considered this could only be done at LDP</li> </ul>

<p>for large scale greenfield sites, such as SE Edinburgh, where issues with surface water and the need for a strategic approach to SUDs have been identified or to set out the criteria by which the need for a strategic approach to SUDs can be assessed</p>	<p>as to how much of that requirement should be met in each of those six areas, both in the period 2009-2019 and...2019-2024". The Draft SG on housing land therefore has a tight focus to provide additional information in support of SESplan policy 5 (Housing Land).</p> <ul style="list-style-type: none"> <li>- If work on large scale greenfield sites and strategic mitigation was to take place it would require to be done at the LDP level, this is because it is the local authorities who decide where housing land and in what form will be allocated within the SDAs and area areas outwith SDAs</li> <li>- Wording has been added to Table 7 for the Water SEA topic, referring to an issue to do with soil sealing and impact on flooding incidents. This wording is described at p8 under the Flood Risk and Water Management heading.</li> </ul>	<p>level.</p> <ul style="list-style-type: none"> <li>- Insert row into Table 7 under SEA Topic 'Water' and under 'Issues Identified' add "Soil sealing within the SESplan region due to the development of greenfield land and impact on flooding incidents through run-off and loss of soak away land", under 'Measures to reduce/prevent/offset' add "identification of compensatory storage opportunities, including within the CSGN (LDP level); identification of areas of strategic SUDs areas (LDP level); and identification of vulnerable areas"</li> </ul>
<p><u>Appendix 3: Detailed Assessments. Table 5: Scottish Borders. Water"</u></p> <p><i>(Table states that the River Tweed, as a water environment, has a significant policy and legislation framework which prevents adverse impacts. As a result a neutral assessment is considered appropriate)</i></p> <ul style="list-style-type: none"> <li>- There is a legislative framework to protect the Tweed but if this is taken into account it could mean allocations cannot be taken forward and this raises the risk of making the</li> </ul>	<ul style="list-style-type: none"> <li>- This is not considered to be the case as the Scottish Borders LDP is at the period of representations stage with the intention that no further land is allocated</li> </ul>	<ul style="list-style-type: none"> <li>- Update the wording of Table 5 Scottish Borders- Water to reflect the position of the Borders LDP</li> </ul>

<p>allocation ineffective</p> <ul style="list-style-type: none"> <li>- A neutral or even a positive assessment is only really possible if the allocations have been tested against or aligned with the RBMP objectives for the Tweed</li> <li>- It is unclear from the ER to what extent the RBMP has been taken into account both in the SG and in the ER for all allocations in the SG</li> </ul>	<p>for housing as a result of the Draft SG. Of the allocations taken forward none are considered ineffective due to impacts on the River Tweed. The wording could be updated to reflect the position of the Borders LDP</p> <ul style="list-style-type: none"> <li>- The Scottish Borders Environmental Report which includes assessment of the housing included in the Draft SG concludes a neutral impact on the Water SEA topic and it is stated that the Council will pursue the conservation and enhancement objectives of the RBMP, as well as natural flood management. SEPA have accepted this assessment in their response to the document. The wording could be updated to reflect the position of the Borders LDP</li> <li>- In the relevant PPS section the RBMPs for the Scotland River District and the Solway Tweed District are included and it is stated that the Draft SG proposals should avoid deterioration of the water environment. It is also the case that in the detailed assessment for each local authority the RBMP objectives are mentioned where it is considered relevant. This could be mentioned in the summary paragraph at 4.15. The SEA objectives are also reflective of the RBMP, although the document is not mentioned</li> </ul>	<ul style="list-style-type: none"> <li>- Update the wording of Table 5 Scottish Borders- Water to reflect the position of the Borders LDP</li> <li>- Add wording to the summary paragraph at 4.15 to state that the relevant RBMPs and their objectives have been considered.</li> <li>- Add reference to the RBMP at Table 5 SEA objectives</li> </ul>
---	--	---

	explicitly and it could be added to the wording at Table 5 SEA objectives	
<p><u>Appendix A Baseline Report</u></p> <ul style="list-style-type: none"> <li>- It is SEPA's view that one element of the CSGN as 'multi-functional place-making' is its potential role as part of a strategic approach to compensate for water storage lost when soil is sealed by development. The ER could elaborate on this aspect of CSGN to identify opportunities to mitigate negative impacts across the SESplan area</li> <li>- There is possibly a slight misunderstanding about flood risk throughout the ER. Avoiding flood risk is not simply a case of avoiding new development in areas likely to flood. There is also a requirement to avoid developing where it may increase the risk of flooding elsewhere</li> </ul>	<ul style="list-style-type: none"> <li>- As previously stated Policy 5 of the SESplan makes clear that the Draft SG is purely concerned with the requirement of housing numbers in the 6 member local authority areas in the periods 2009-1029 and 2019-2024.</li> <li>- It is therefore considered that identification of opportunities to mitigate negative impacts across the SESplan area is not appropriate within this SEA but could be explored at the LDP level, which is in line with SESplan Policy 11 'Delivering the Green Network'</li> <li>- Under Flood Risk and Water Management (p8 above) the potential for the CSGN to compensate for water storage lost has been introduced to the environmental assessment.</li> <li>- No specific examples are given of this misunderstanding but references to flood risk will be checked and updates made where it is considered necessary</li> </ul>	<ul style="list-style-type: none"> <li>- Table 7 'Measures envisaged for the prevention, reduction &amp; offsetting of any significant adverse effects' has been amended at the 'Water' row to include 'Identification of compensatory storage opportunities, including within the CSGN (LDP level)'</li> <li>- Updates to references to flood risk can be made where necessary</li> </ul>
<u>Air Quality</u>		

<ul style="list-style-type: none"> <li>- 4.7. “The assessments under the Air topic are mainly neutral, in all areas it is anticipated that additional car journeys and short-medium term construction projects will bring a negative effect. In East Lothian and Fife it is considered that there is a risk of minor negative effects from the additional allocations because of the increased air emissions on already congested routes”</li> <li>- There appears to be a contradiction in this section which recognises that there will be a negative impact on air quality but which concludes that assessments of allocations are mainly neutral. This section should be clarified.</li> <li>- East Lothian and Fife are not the only parts of the SESplan area with congested routes...it is another reason to re-visit this topic area, both in this section and throughout the ER with attention given to some examples of what additional emissions would tip the balance to creating AQMA and what level of additional traffic, even from a small allocation, would create those additional emissions</li> </ul>	<ul style="list-style-type: none"> <li>- It is agreed that the wording in paragraph 4.7 is unclear and that the assessment could be revisited. As a result paragraph 4.7 will change to summarise the revised assessment findings and the detailed assessments for each local authority at Appendix 3, with regards to ‘Air’ will also be edited where appropriate.</li> <li>- It is considered that the scale of additional allocations is important, there is a large degree of uncertainty because of the size of the SDAs, the limited number of housing and the time involved for the housing to come forward.</li> <li>- It is accepted there are other busy routes within the SESplan area but this must be balanced with the provision of public and sustainable transport links and the proximity to services, employment and other destinations.</li> </ul>	<ul style="list-style-type: none"> <li>- Overall the assessment does not change in terms of identified negative and neutral impacts on the SEA topic for each local authority area. However the reasoning of the assessment is now more robust and a number of revisions have been made in the Summary section at paragraph 4.7 (and a new paragraph 4.8) and at Appendix 3 for each respective local authority.</li> </ul>
<p><u>Appendix 3: Detailed Assessments. Table 5: Scottish Borders. Air”</u></p> <ul style="list-style-type: none"> <li>- Table 5: Scottish Borders. Air. “These net changes ... As a result a neutral impact is considered appropriate as there are measures to avoid increased emissions from car journeys.” A note of caution is advised in</li> </ul>	<ul style="list-style-type: none"> <li>- The Borders Proposed LDP has been subject to SEA and the allocations (which include the additional requirement identified in the Draft SG) have been assessed as to their impact on the Air SEA</li> </ul>	<ul style="list-style-type: none"> <li>- Revisions have been made to paragraph 4.7 and at the relevant part in Table 5 of Appendix 3 to better reflect the Scottish Borders Proposed LDP assessment</li> </ul>

<p>making this assumption. It cannot be assumed that the number of car journeys by train will be equal to or greater than the increase in car journeys occasioned by additional allocations, and, therefore, a neutral effect cannot be assumed.</p> <ul style="list-style-type: none"> <li>- It should be kept in mind that rail travel is not neutral in terms of emissions, green house gases and other effects. This may not lead to a negative effect on local air quality but it does make a contribution to climate change.</li> </ul>	<p>topic. No negative impacts were found largely because of the proximity of the allocations to town centres and sustainable transport links. It was also considered that the limited size of the allocations and the high air quality were pertinent factors</p> <ul style="list-style-type: none"> <li>- This was not made clear in the original Environmental Report for the Draft SG and so revisions have been made to paragraph 4.7 and at the relevant part in Table 5 of Appendix 3.</li> </ul>	
<p><u>Climate Change (mitigation and adaptation)</u></p> <p>It would be helpful if the ER was more explicit about the distinction between mitigating climate change and adapting to climate change. Not building in an area which may flood due to climate change, for instance, is adaptation to climate change it is not mitigation of climate change</p>	<ul style="list-style-type: none"> <li>- Relevant sections can be looked at to try and make the distinction clearer</li> </ul>	<ul style="list-style-type: none"> <li>- Look at relevant sections and make changes as necessary</li> </ul>
<p><u>Appendix A Baseline Report. Paragraph 7.7: “The Zero Waste Plan aims to deliver a ‘zero waste Scotland over the next 10 years’</u></p> <p>The ER could identify initiatives in the SESplan area to use waste as a resource, for example Fife Council’s Heat Map. These initiatives could be assessed to identify beneficial outcomes from the SG, for instance, housing allocations aligned with Fife Council’s Heat Map, combined with guidance or advice on linking new housing with opportunities for heat and energy from waste.</p>	<ul style="list-style-type: none"> <li>- The Draft SG has a tight focus on meeting the requirement for housing (as a requirement from SESplan Policy 5 ‘Housing Land’) and as a result it is considered that work to identify initiatives to use waste as a resource and to provide strategic policy direction on linking new housing with opportunities</li> </ul>	<ul style="list-style-type: none"> <li>- Put forward use of waste as a resource and linkages to new housing to opportunities for energy from heat and waste to be considered at SESplan 2 level</li> </ul>

	for heat and energy from waste, are more appropriately considered at SESplan 2 level	
<p><u>Additional Points</u></p> <ul style="list-style-type: none"> <li>- At certain points in the ER there seems to be an overlap with the requirements of the Habitats Regulations. Although there are useful benefits in combining work, where possible, on SEA and Habitats Regulations Appraisals, the appraisals need to be kept separate.</li> <li>- There are a number of references in the ER to a design-led approach. We support this approach and want to engage, as partners, in developing it and helping to take allocations through it to implementation. We believe that issues we have raised in this letter, such as strategic SUDS, should be addressed as central to design: we believe this not only because adequate SUDS are of importance to SEPA, but because when SUDS, for instance, are required and they have not been taken into account at the earliest stages of design they could compromise other elements of the design.</li> </ul>	<ul style="list-style-type: none"> <li>- No specific example of this is given and it must be assumed that the Biodiversity, flora and fauna assessment paragraph (4.8) is what is being referenced. It is considered that this reference is needed because European Protected Species are critical to the biodiversity of the SESplan area. The statement has been updated to reflect further work completed on the HRA</li> <li>- Reference to strategic level SUDS has been dealt with under the Water topic at p8 above.</li> <li>- It is hoped that a strategic design-led approach can be articulated through the development of SESplan 2</li> </ul>	<ul style="list-style-type: none"> <li>- No further action required</li> <li>- No further action required</li> </ul>



Respondent: Historic Scotland		
<u>Current state of the environment</u>		
<p>...it is important that historic battlefields be taken into account</p>	<ul style="list-style-type: none"> <li>- the original baseline is being retained due to the parallels between the SESplan Updated Environmental Report and the Draft SG SEA process. However a map can be produced showing the relevant sites and inserted as an appendix to the Updated Environmental Report</li> </ul>	<ul style="list-style-type: none"> <li>- Produce a map showing the relevant battlefield sites and insert it into the relevant part of the Updated Environmental Report (Appendix 4)</li> </ul>
<u>Monitoring indicators</u>		
<p>Under Cultural Heritage, it is stated to 'avoid adverse impacts on Conservation Areas and the historical heritage of the SESplan area'. We would question why Conservation Areas in particular have been identified over other historic environment assets...a similar statement to that of Landscape and Townscape may be more appropriate, for example, 'avoid adverse impacts on the site and setting of historic environment assets within the SESplan area'</p>	<ul style="list-style-type: none"> <li>- It is agreed that a more general statement would be more appropriate which refers to other aspects of Cultural Heritage</li> </ul>	<ul style="list-style-type: none"> <li>- Amend the wording to state "Avoid adverse impacts on the site and setting of historic environment assets within the SESplan area"</li> </ul>
<u>SEA Objectives</u>		
<ul style="list-style-type: none"> <li>- We would recommend the use of monitoring indicators that better reflect the outcome of the SG/Plan, such as, '<i>the number and outcome of planning applications where significant effects on the historic environment have been identified</i>'.</li> </ul>	<ul style="list-style-type: none"> <li>- It is agreed that the monitoring indicators could be better reflective of the outcomes of the SG</li> </ul>	<ul style="list-style-type: none"> <li>- The monitoring indicators should be changed to look at the number and outcome of planning applications with significant effects on- listed buildings; scheduled monuments; world heritage sites; designed gardens and landscapes; and buildings at risk</li> </ul>

<ul style="list-style-type: none"> <li>- Additionally you may wish to consider a review of effects upon the historic environment in delivering the SG/Plan through the LDPs that looks at themes and issues in a narrative format.</li> </ul>	<ul style="list-style-type: none"> <li>- It is considered that effects are discussed in the detailed assessment for the respective local authority areas</li> </ul>	<ul style="list-style-type: none"> <li>- No further action necessary</li> </ul>
<p><u>Assessment of environmental effects</u></p> <ul style="list-style-type: none"> <li>- ...commentary would appear to indicate that the potential for negative and positive effects on Cultural Heritage would cancel each other out resulting in a neutral prediction. We would question this approach and would highlight that in the case of this SG, there would appear to have been no spatial assessment of potential effects undertaken. Relying on a design-led approach and application of policy at the LDP level may not be able to achieve a position of neutral effects for cultural heritage...we would suggest that the effects are more likely to be unknown or potentially negative taking into account the fact that the SG relates to significant housing land allocations which will likely has a greater potential for negative effects on historic environment assets than positive</li> <li>- ...we would also emphasis the need to consider the suitability of housing land allocations in relation to cultural heritage prior to the masterplanning stage</li> </ul>	<ul style="list-style-type: none"> <li>- It is accepted that the assessments in Appendix 3 regarding Cultural Heritage, with respect to the member Local Authorities can be revisited. As a result this will change the summary paragraph at Section 4 of the Updated Environmental Report.</li> <li>- It is considered that although the impression of a trade-off in the existing assessment was not the intention, it was the case that it was felt that the requirement for the SESplan area which was been assessed could have a neutral impact because at the LDP level, where the housing is allocated, there would be a need to adhere to SESplan Policy 1B 'Spatial Strategy: Development Principles' which states that LDPS will ensure "that there are no significant adverse impacts on the integrity of international and national built or cultural heritage sites...". When a design-led approach was considered on top of this it was considered a neutral impact was possible</li> <li>- The assessment should have been more</li> </ul>	<ul style="list-style-type: none"> <li>- The assessments for the respective Local Authorities should be revisited and a change in the score considered. Then Section 4, the summaries, should be updated, if necessary.</li> <li>- Further justification of the assessment process should be added to provide better evidence and make the assessment clearer</li> </ul>

	clear on this reasoning	
--	-------------------------	--

**APPENDIX E**      Habitats Regulations Assessment

**SESplan Housing Supplementary Guidance**

**HRA Record**

**February 2014**

## 1. Introduction

- 1.1 The purpose of this HRA record is to assess whether the proposals contained within the SESplan Housing Supplementary Guidance (herein referred to as the 'SG') will cause likely significant effects (LSE) on the conservation objectives of European Sites in and outwith the SESplan area.
- 1.2 The SG has been prepared to provide detailed further information in support of SDP Policy 5 Housing Land. The further information will provide direction for Local Development Plans (LDP) as to how much of the overall housing land requirement should be met in each of the six member authority areas (City of Edinburgh, East Lothian, Fife, Midlothian, Scottish Borders and West Lothian).
- 1.3 An HRA was undertaken for the SESplan Proposed Plan and, following approval of the SESplan, Scottish Ministers agreed that there was no need to update this HRA in light of changes made to the document.
- 1.4 However it is considered that for this SG that a further HRA is required, for the reason that the previous HRA reached an end point following SESplan approval, but also because the SG introduces the potential for significant change with regards to phasing and the distribution of housing requirements that should be assessed. It is considered that this approach is confirmed by the 'Procedural requirements of the Habitats Regulations' as stated in the 'Guidance for Plan-Making Bodies in Scotland Version 2' (2012: 2).

## 2. Methodology of the SG

- 2.1 It is stated within the SG that "...there is a requirement for a total of 155,544 houses to be provided over the period to 2032. This total requirement as identified by the Housing Needs Demand Assessment...is to be distributed across the three SDP plan periods 2009-2019 (74,345 houses), 2019-2024 (32,710) and 2024-2032 (47,999).
- 2.2 In order to identify sufficient land to meet this requirement a Technical Note has been produced which reviews the original Spatial Strategy Assessment in terms of analysing opportunities and environmental and infrastructure capacities and constraints. Relevant to this HRA record is the fact that no Strategic Development Areas (SDA) are located *on* European Sites.
- 2.3 In addition, in setting out the housing land requirement, the SG must be consistent with the spatial strategy in the approved SESplan meaning additional allowances should be directed to brownfield land as a priority, as well as being located within identified SDAs. However, the Technical Note analysis does not result in any further significant brownfield housing opportunities being identified and this means that additional land outwith SDAs will have to

be allocated in LDPs. Areas outwith SDAs are therefore identified at City of Edinburgh, Fife and the Scottish Borders.

2.4 The respective local authorities are at different stages of Local Development Plan production and therefore this must be taken cognisance of in this HRA. For example, Scottish Borders has already identified housing to meet any additional requirement identified in the Housing SG and this is therefore covered in the Scottish Borders Proposed Plan HRA.

2.5 SESplan Policy 7 'Housing Land Development Outwith Strategic Development Areas' states that greenfield land identified in Local Development Plans may be permissible for housing where criteria are also met. The criteria would ensure the development is in keeping with the character of the settlement and the local area; would not compromise green belt objectives; and additional infrastructure required would be either committed or funded by any developer. The Supplementary Guidance states that "LDPs will include a detailed assessment of the amount of housing land to be allocated outwith SDAs and consideration of potential sites" (para 3.10 p6: 2013).

2.6 The SG is therefore required to establish how the housing requirement as identified in the HNDA will be distributed within the two time periods, 2009-2019 and 2019-2024, amongst the six local authority areas. The precise requirement is 107, 545 units (74,840 in the period 2009-2019 and 32,720 in the period 2019-2024). The SG identifies that based on a 2012 Housing Land Audit the total supply across the SESplan area to 2024 is 83,207 units and as a result to meet the requirement of 107,545 units by 2024 LDPs will have to identify land to accommodate an additional 24, 338 units.

2.7 The Proposed Plan identified 10,150 units in addition to the committed development. As part of the assessment of opportunities and infrastructure and environmental capacities and constraints, it was identified that the developments that made up those additional units were still appropriate and in accordance with the approved SDP. Therefore there was a need to identify capacity to:

- set housing requirements to meet the overall SESplan requirement; and
- meet the shortfall between the revised established land supply and the housing requirements.

2.8 Table 1 below sets out the additional allowances that will make up that shortfall by SDA and area outwith SDA:

<b>Table 1: Proposed Plan and Supplementary Guidance Additional Allowances</b>					
<b>SDA</b>	<b>2009-2019 Proposed Plan</b>	<b>2019-2024 Proposed Plan</b>	<b>Proposed Plan total (2009-2024)</b>	<b>SG additional identified requirements</b>	<b>SG total requirements</b>
W Edin	1000	1000	2000	700	2700
SE Edin	600	850	1450	1500	2950
<i>Of which:</i>					
<i>Edin</i>	(500)	(500)	(1000)	(1500)	(2500)
<i>Midlothian</i>	(100)	(350)	(450)	(0)	(450)
Central Edin	0	0	0	0	0
Edin Waterfront	0	0	0	0	0
Outwith Edinburgh SDA	0	0	0	2500	2500
East Lothian	0	750	750	2810	3560
Eastern Borders	0	50	50	110	160
North Dunfermline	0	500	500	2130	2630
Ore/Upper Leven	0	500	500	2720	3220
Outwith SDAs (Fife)	600	200	800	1150	1950
A7/A68/Borders Rail	350	900	1250	100	1350
A701 Corridor	250	500	750	0	750
Central Borders	0	200	200	90	290
Western Borders	0	100	100	10	110
Outwith SDAs (Borders)	0	50	50	30	80
West Lothian	500	1250	1750	380	2130
		<b>Totals</b>	<b>10150</b>	<b>14230</b>	<b>24380</b>



2.9 Table 1 shows that the Housing SG identifies additional allowances of 19,580 units in the SDAs as well as 4,530 units outwith SDAs in the City of Edinburgh, Fife and the Scottish Borders LDP areas.

2.10 For the HRA it is critical to note that the figure of 10,150 units from the Proposed Plan **was** assessed in the Proposed Plan HRA and it is therefore not necessary to assess this figure again. The additional 14,230 units necessary to meet the housing requirements set out in the Supplementary Guidance **was not** assessed in the Proposed Plan HRA and it is this latter figure that the assessment in this HRA should focus on. The remainder of the housing requirement will be met by existing committed development. This will have been allocated in previous plans, already granted permission, or will come from windfall development.

### 3. HRA Methodology

3.1 Due to the limited scope of the changes between the SG and the Proposed Plan this HRA Record should build on the Proposed Plan HRA where appropriate. In doing this, it will allow the assessment that takes place in this HRA Record to be concise and focussed on the net figure of 14,230. The Proposed Plan HRA is contained as Appendix 1 to this HRA.

3.2 With this approach in mind, it is considered that the European Sites identified in the Proposed Plan HRA are the ones that will be used for the assessment in this Record. Appendix 2 provides the details on these sites including the conservation objectives. The sites are:

- Berwickshire & North Northumberland Coast SAC
- Blawhorn Moss SAC
- Firth of Forth SPA/Ramsar
- Forth Islands SPA
- Isle of May SAC
- River Teith SAC
- River Tweed SAC
- St Abb's to Fast Head Castle SAC
- St Abb's to Fast Head Castle SPA
- Whitlaw & Branxholme SAC

3.3 To do this it is considered that a short initial screening can be provided, this is to confirm what SDA and areas Outwith SDA should be scoped out or carried into the HRA. Where there is any uncertainty the SDA or Local Authority area Outwith an SDA will be screened in, this is in line with the precautionary principle.

## 4. Screening

4.1 Table 2 below shows the screening of the SDAs and the three Local Authorities where housing may be located outwith SDAs. The table provides three options for a screening decision: no LSE (screened out), LSE (screened in) and minor residual effect possible (screened in for later in-combination assessment); there is then a column for justification of this decision. Where a decision is to screen out, this has been done in line with the Steps listed in the 'Guidance for Plan-Making Bodies in Scotland Version 2' (2012: 17-20).

Table 2 Screening of SG Proposals		
SDA or local authority area outwith an SDA	LSE (IN)	Justification
	Minor residual effect (IN-in combination)	
	No LSE (Out)	
West Edinburgh		The SDA is screened in because it is considered that the additional 700 units have a link to LSE on the conservation objectives of the Firth of Forth SPA, Forth Islands SPA, Isle of May SAC and the River Teith SAC. This is in line with the links established in the Proposed Plan HRA.
South East Edinburgh		Screening Step 3 c)  At the Proposed Plan stage it was agreed with SNH that there was no possible link to a LSE on the conservation objectives of a European Site from housing in this SDA. It is considered that the additional 1500 do not change this assessment.
Edinburgh City Centre		Screening Step 3 c)
Edinburgh Waterfront		For Edinburgh City Centre and Waterfront SDAs there is no provision for any development and therefore there is no possible link to any European Site
City of Edinburgh		It is considered that the additional 2500 units have a link to LSE on the conservation objectives of the Firth of Forth SPA, Forth Islands SPA, Isle of May SAC and the River Teith SAC.
East Lothian		The SDA is screened in because it is considered that the additional 2810 units have a link to LSE on the conservation objectives of the Firth of Forth SPA, Forth Islands SPA, Isle of May SAC and the River Teith SAC. This is in line with the links

		established in the Proposed Plan HRA.
North Dunfermline		The SDA is screened in because it is considered that the additional 2130 units have a link to LSE on the conservation objectives of the Firth of Forth SPA, Forth Islands SPA, Isle of May SAC and the River Teith SAC. This is in line with the links established in the Proposed Plan HRA.
Ore/Upper Leven Valley		The SDA is screened in because it is considered that the additional 2720 units have a link to LSE on the conservation objectives of the Firth of Forth SPA, Forth Islands SPA, Isle of May SAC and the River Teith SAC. This is in line with the links established in the Proposed Plan HRA.
Fife (Outwith SDAs)		It is considered that the additional 1150 units have a link to LSE on the conservation objectives of the Firth of Forth SPA, Forth Islands SPA, Isle of May SAC and the River Teith SAC.
A7/A68/Borders Rail Corridor		Screening Step 3 c)  The HRA of the Proposed Plan stated that there was no link from the SDA to any European Site and it was screened out as a result. It is considered that the additional 100 unassessed units do not change this initial assessment.
A701 Corridor		Screening Step 3 c)  There is no provision in the Housing SG for additional unassessed units.
Eastern Borders		The Draft SG additional requirement of 110 units is already accounted for in the Scottish Borders Proposed Local Development Plan and has been assessed in the Scottish Borders Proposed Plan HRA. It is therefore unnecessary to assess again in this HRA
Central Borders		The Draft SG additional requirement of 90 units is already accounted for in the Scottish Borders Proposed Local Development Plan and has been assessed in the Scottish Borders Proposed Plan HRA. It is therefore unnecessary to assess again in this HRA
Western Borders		The Draft SG additional requirement of 10 units is already accounted for in the Scottish Borders Proposed Local Development Plan and has been assessed in the Scottish Borders Proposed Plan

		HRA. It is therefore unnecessary to assess again in this HRA
Scottish Borders (Outwith SDAs)		The Draft SG additional requirement of 30 units is already accounted for in the Scottish Borders Proposed Local Development Plan and has been assessed in the Scottish Borders Proposed Plan HRA. It is therefore unnecessary to assess again in this HRA
West Lothian		The SDA is screened in because it is considered that the additional 380 units have a link to LSE on the conservation objectives of the Firth of Forth SPA, Forth Islands SPA, Blawhorn Moss SAC, Isle of May SAC and the River Teith SAC. This is in line with the links established in the Proposed Plan HRA.

4.2 Table 2 results in the following SDA and local authority areas outwith SDA being screened in

- West Edinburgh
- City of Edinburgh (outwith SDA)
- East Lothian
- North Dunfermline
- Ore/Upper Leven Valley
- Fife (outwith SDA)
- Eastern Borders
- Central Borders
- West Lothian

## 5. Applying straightforward mitigation and re-screening

5.1 In agreement with SNH it is considered that the Proposed Plan HRA provides strategic mitigation measures that, if applied to the additional allocations that are not already assessed in the SG, will prevent any adverse effect on the site integrity of any European Site where a link to LSE was established at Screening.

5.2 The Proposed Plan HRA found that there was a link to LSE on all of the European Sites for which a link has been established in the SG. However, it was also stated that the housing proposals left uncertainty over precise impacts and that it was therefore impossible to state

that any of the qualifying interests would definitely not be affected by LSE caused by housing development. The precautionary principle was therefore applied. For the SG additional allowances that have not been assessed it is considered the situation is the same.

5.3 It was therefore considered in the Proposed Plan HRA that broad strategic measures could be identified to help guide lower tier plan HRAs (i.e. LDP HRAs). These strategic measures were:

- Avoidance of development located on the European Sites in question or on land directly associated with the functioning of the site or behaviour of the qualifying interest- *This could be achieved through a spatial strategy or other site assessment process where one of the criteria is avoidance of European Sites*
- Avoidance of development that could create/exacerbate flood risk which may cause direct/indirect adverse effect(s) on site integrity i.e. through mobilisation of sediments/contaminants- *This could be built into any Strategic Flood Risk Assessment and/or born in mind in any site assessment process.*
- Prevent damage of European Sites and disturbance of qualifying interests from recreational users (including dogs) on both land and water- *Minimise additional disturbance through provision in new residential developments for sufficient high quality greenspace with links to the green network*
- Prevent waste water, sewage, pollutants and sediments entering the Forth/River Tweed/North Sea directly or entering waters that lead to the Forth/River Tweed/North Sea- *this can be achieved through promotion of SUDS and avoidance of flood risk through adherence to SEPA and Scottish Water advice*

5.4 It is considered that these broad strategic measures also apply to the overall requirement and additional allowances not assessed in the SG.

5.5 The final conclusion of the Proposed Plan HRA was that further assessment would be required at LDP level to determine the precise nature of any LSE on the conservation objectives of European Sites as a result of the housing proposals. Again this is considered directly relevant to the additional allowances not assessed in the SG, and therefore the same assertion is made here.

5.6 By employing these strategic mitigation measures and providing the additional caveat that LDP level HRA will be required to provide more detailed assessment it is considered that when the SG is re-screened there is no likelihood of significant effects on the conservation objectives of the European Sites identified at Section 3 Methodology.

## **6. Conclusion**

- 6.1 In order to meet the overall housing requirement, the SG presents additional housing allowances in certain SDAs and areas outwith SDA that were not previously assessed in the Proposed Plan HRA. These allowances bring a link to LSE on a number of European Sites.
- 6.2 It was agreed with SNH that the mitigation undertaken in the appropriate assessment of the Proposed Plan HRA was directly relevant to the additional allocations that have not been assessed in the SG. As a result this mitigation was described in the 'Straightforward Mitigation and re-screening' section above with the conclusion that strategic mitigation measures and a caveat of further detailed assessment at LDP HRA level would prevent LSE on the conservation objectives of European Sites identified at Section 3 Methodology.

## Appendix 2

### Supplementary Guidance and Technical Note (incorporating minor editorial changes)

# Supplementary Guidance

Housing Land  
May 2014







## Contents

1 Introduction	2
2 Policy Context	3
3 Housing Land Requirement	4
4 Glossary	8

## 1 Introduction

### 1 Introduction

**1.1** This Supplementary Guidance is prepared under Section 22 of the Planning etc (Scotland) Act 2006 in connection with the Strategic Development Plan (SDP) for South East Scotland as approved by Scottish Ministers on 27 June 2013. The adopted Supplementary Guidance will form part of the development plan.

#### **Purpose**

**1.2** The purpose of the Supplementary Guidance is to provide detailed further information in support of SDP Policy 5 (Housing Land). The further information will provide direction for Local Development Plans (LDPs) as to how much of the overall housing land requirement should be met in each of the six member authority areas (City of Edinburgh, East Lothian, Fife, Midlothian, Scottish Borders and West Lothian).

#### **Preparation**

**1.3** The Supplementary Guidance is based on an analysis of opportunities and of the infrastructure and environmental capacities and constraints. A Technical Note has been prepared in support of this Supplementary Guidance. The Technical Note contains the background information and report of survey work undertaken to prepare the Supplementary Guidance itself. A Strategic Environmental Assessment (SEA) has been undertaken for the Supplementary Guidance. This is set out in a separate document.

**1.4** The Supplementary Guidance, supporting Technical Note and SEA have been prepared in consultation with the six member authorities.

## 2 Policy Context

**2.1** Under the terms of the Planning etc (Scotland) Act 2006, the six member authorities that make up the SESplan Strategic Development Planning Authority (SDPA) are required to prepare an SDP for South East Scotland. The first SDP, which was approved by Scottish Ministers on 27 June 2013, sets clear parameters for each of the six LDPs covering the period to 2032. The spatial strategy set out in the approved SDP builds on approaches in existing development plans focusing development along preferred corridors optimising connectivity and access to services and jobs. Policy 1A (Spatial Strategy Development Locations) identifies five sub regional areas (Regional Core, East Coast, Fife Forth, Midlothian / Borders, West Lothian). Within these, further development will be focused in 13 Strategic Development Areas (SDAs) acting as the primary locations for growth and investment:

- West Edinburgh;
- South East Edinburgh;
- Edinburgh City Centre;
- Edinburgh Waterfront;
- East Lothian;
- Eastern Borders;
- North Dunfermline;
- Ore / Upper Leven Valley;
- A7 / A68 / Borders Rail Corridor;
- A701 Corridor;
- Central Borders;
- Western Borders; and
- West Lothian.

**2.2** SDP Policy 5 (Housing Land) identifies that, for the period from 2009 up to 2024, there is a requirement for sufficient housing land to be allocated so as to enable 107,545 houses to be built across the SESplan area, including on land which is currently committed for housing development. Policy 5 also indicates that Supplementary Guidance will be prepared to provide detailed further information as to how much of the requirement should be met in each of the six member authority areas, both in the period 2009 - 2019 and in the period 2019 - 2024. The Supplementary Guidance is to be based on an analysis of opportunities and of the infrastructure and environmental capacities and constraints. The approved SDP also notes that, due to environmental constraints and other restrictions within the City's boundaries, a significant proportion of housing need and demand generated in the City of Edinburgh Council area will need to be met in the other five LDP areas. The accompanying Technical Note sets out the survey and analysis work undertaken.

**2.3** The Supplementary Guidance has been prepared in accordance with other relevant SDP policies including Policy 1B (The Spatial Strategy Development Principles) and Policies 6 and 7 (Housing Land Flexibility and Maintaining a Five Year Housing Land Supply).

## 3 Housing Land Requirement

### 3 Housing Land Requirement

**3.1** The SDP must ensure that the housing needs and demand of the SESplan area can be met. As detailed in the approved SDP and as required by national policy, it is the role of the SDP to provide the framework for the six LDPs within the SESplan area to allocate sufficient land for housing development.

**3.2** Across the SESplan area, there is a requirement for a total of 155,544 houses to be provided over the period to 2032. This total requirement as identified by the Housing Needs and Demand Assessment (HNDA) (see Table 2, Assessed Housing Requirements by Plan Period contained within the SDP) is to be distributed across the three SDP plan periods 2009 - 2019 (74,835 houses), 2019 - 2024 (32,710 houses) and 2024 - 2032 (47,999 houses). Sufficient land must therefore be identified across the six LDP areas to accommodate the housing land requirement over the period to 2024, a total of 107,545 units.

**3.3** As set out in the accompanying Technical Note, in order to identify sufficient land to accommodate the housing land requirement a review of the opportunities and of the environmental and infrastructure capacities and constraints has been undertaken. This has included a refresh and review of data and information collated to support the approved SDP and has meant an update of the established land supply based on Housing Land Audit (HLA) 2012 instead of HLA 2010, a review of the output from all brownfield sites in the established supply and the housing market in terms of viability and deliverability and a refresh of the Spatial Strategy Assessment undertaken to support the Proposed Plan. The latter included a review of the entire SESplan area against criteria such as infrastructure capacity, land availability, green belt and transport.

**3.4** The housing land requirement set out in this Supplementary Guidance must be consistent with the approved SDP and in particular the spatial strategy by prioritising brownfield land and locating additional development within the identified SDAs in the first instance. The policy principles for the location of development as set out in Scottish Planning Policy (SPP) and contributing towards successful place making have informed the requirement by LDP area. The requirement must also balance the principle of seeking to meet need and demand where it arises with the capacity and constraints analysis, as well as market and deliverability considerations.

**3.5** The distribution of the overall housing land requirement by LDP area builds on, and complements, existing committed development in accordance with the approved Spatial Strategy of the SDP. Capacity for development, that can be accommodated sustainably, has been identified where need arises and demand is found. This has had to take account of the analysis of the opportunities, constraints and capacities. This identified that there is insufficient sustainable capacity within the City of Edinburgh boundaries to meet a significant proportion of the demand for housing that arises there. Therefore, the shortfall has had to be made up in the other five LDP areas. This has either been located in areas closest to Edinburgh (e.g. Midlothian will deliver 4,000 units in the South East Edinburgh SDA) or to build on sustainable development opportunities, such as the opening of the Borders Railway. Full details on how all the factors were considered in the Supplementary Guidance preparation process are set out in the accompanying Technical Note.

## Housing Land Requirement 3

**3.6** Based on the outcomes of the analysis undertaken and the considerations set out above, the distribution of the housing land requirement of 107,545 units in the periods 2009 - 2019 and 2019 - 2024 is set out in Table 3.1 below. LDPs must identify sufficient sites and locations to accommodate the housing land requirements set out in Table 3.1. Please note that the figures have been rounded to the nearest 10.

**Table 3.1 Housing Land Requirement by Local Development Plan Area**

Local Development Plan	2009 - 2019	2019 - 2024
City of Edinburgh	22,300	7,210
East Lothian	6,250	3,800
Fife	17,140	7,430
Midlothian	8,080	4,410
Scottish Borders	9,650	3,280
West Lothian	11,420	6,590
<b>SESplan Totals 2009 - 2019 and 2019 - 2024</b>	<b>74,840</b>	<b>32,720</b>
<b>SESplan Total 2009 - 2024</b>	<b>107,560</b>	

**3.7** Most of the new houses required are expected to be built on land which is already committed for development either because it is already allocated for that purpose or because planning permission has been granted. Based on HLA 2012 and including an allowance for constrained and windfall sites to come forward and for demolitions, the total supply across the SESplan area to 2024 is 83,207 units. To meet the total requirement of 107,545 units, it is therefore expected that LDPs will need to identify land to accommodate at least an additional 24,338 units.

**3.8** The extent to which sites already identified for housing (i.e. the 83,207 units) remain capable of delivering house completions by 2024 must be re-assessed in LDPs (SDP paragraph 23). Any changes in this figure will have implications for the amount of additional housing land needed. Where necessary, alternative housing sites will need to be allocated.

**3.9** Consistent with SPP and paragraph 113 of the approved SDP, LDPs should give priority to brownfield sites within existing built up areas when allocating new sites for housing development. Where additional land is required, sites should first be sought within the identified SDAs. No significant new brownfield housing opportunities have been identified at this time. Based on an analysis undertaken of opportunities and constraints within SDAs, Table 3.2 indicates the potential contribution that each SDA could make towards meeting the housing requirement. These figures will need to be re-assessed in LDPs to demonstrate that the requirements of SDP paragraph 113 have been met.

### 3 Housing Land Requirement

**3.10** The analysis undertaken in preparing the Supplementary Guidance suggests that additional sites will need to be allocated outwith SDAs and that the most appropriate locations for these are in the City of Edinburgh, Fife and the Scottish Borders. An indication of how much land may be needed outwith SDAs and how this could be distributed is also included in Table 3.2. LDPs will include a detailed assessment of the amount of housing land to be allocated outwith SDAs and consideration of potential sites.

**3.11** New development proposals will complement and not undermine the delivery of existing committed development. In all circumstances, the principles and criteria set out within Policies 1B (Spatial Strategy Development Principles) and 6 (Housing Land Flexibility) must be adhered to and met by each of the six LDPs. Policy 7 (Maintaining a Five Year Housing Land Supply) enables LDPs to allocate sites outwith SDAs, subject to satisfying the policy criteria.

**Table 3.2 Additional Allowances Within and Outwith Strategic Development Areas**

Strategic Development Area	Additional Allowances
West Edinburgh	2,700
South East Edinburgh	2,950 (2,500 in City of Edinburgh and 450 in Midlothian)
Edinburgh City Centre	0
Edinburgh Waterfront	0
East Lothian	3,560
North Dunfermline	2,630
Ore / Upper Leven Valley	3,220
A7 / A68 / Borders Rail Corridor	1,350
A701 Corridor	750
Eastern Borders	160
Central Borders	290
Western Borders	110
West Lothian	2,130
<b>SESplan Within Strategic Development Areas</b>	<b>19,850</b>
<b>Outwith Strategic Development Areas</b>	<b>Additional Allowances</b>
City of Edinburgh	2,500
Fife	1,950

## Housing Land Requirement 3

Strategic Development Area	Additional Allowances
Scottish Borders	80
<b>SESplan Outwith Strategic Development Areas</b>	<b>4,530</b>
<b>SESplan Additional Allowances</b>	<b>24,380</b>

**3.12** Please note all figures within Table 3.2 have been rounded to the nearest 10.

## Delivery

**3.13** Maintaining a supply of effective land for at least 5 years at all times, in accord with approved SDP Policy 6 and Policy 7, should ensure that there is a continuing generous supply of land for house building. Member authorities will base their calculation of the five year land supply on the period 2009 - 2024, taking into consideration housing completions. SESplan, in conjunction with member authorities, will monitor the supply of housing land on an annual basis in order to assess progress against the overall housing land requirement set out in Table 3.1. This will inform the preparation of LDPs and the second SDP.

**3.14** A very significant increase in the rate of house completions across the SESplan area will be needed if the requirements set by this Supplementary Guidance are to be met. This is challenging and particularly so in 2009 - 2019 as it is expected that LDPs will be adopted around 2015, around six years into the first period (2009 - 2019).

**3.15** Significant transport and strategic infrastructure improvements are essential to support the delivery of the housing land requirement set out in this Supplementary Guidance. These infrastructure requirements are set out in Figure 2 of the SDP and the accompanying Action Programme. In particular, school extensions and new schools to provide the additional pupil places required to meet development need are seen as essential and must be delivered alongside development. LDPs will provide further details on these requirements and further policy guidance in accord with Policy 9 (Infrastructure) of the approved SDP.

**3.16** The Supplementary Guidance sets out a housing land requirement to meet need and demand from the South East Scotland region. Delivering that level of housing will be challenging and that will be made even more difficult should funding solutions to enable the provision of essential infrastructure improvements not be identified. A very significant increase in housing completion rates will also be required to deliver the housing needed to meet the need and demand which has been identified. Setting requirements for housing land at levels to meet the HNDA estimates of need and demand for housing units in the South East Scotland region will ensure that the supply of housing land identified in development plans will not be the reason for failing to meet this challenge.



## 4 Glossary

### 4 Glossary

<b>Constrained Housing Land Supply</b>	That part of the established housing land supply which may be affected by infrastructure constraints, land contamination or ownership / marketing issues.
<b>Effective Land Supply</b>	The part of the established housing land supply which is free or expected to be free of development constraints in the period under consideration, and will therefore be available for the construction of housing.
<b>Established Land Supply</b>	The total housing land supply - including both unconstrained and constrained sites. The Established Land Supply includes the effective housing land supply.
<b>Supplementary Guidance</b>	Provides further information or detail in respect of policies or proposals set out in the Strategic Development Plan or Local Development Plan. Statutory guidance adopted in connection with a plan, forms part of the development plan.
<b>Windfall</b>	A site which becomes available for development during the plan period which was not anticipated to be available when the plan was being prepared.



**You can get this document, in Braille, large print and various formats if you ask us.**

Please contact ITS on 0131 242 8181 and quote reference number **13-1316**.

ITS can also give information on community language translations. You can get more copies of this document by calling **0131 524 5165**.



**HAPPY TO TRANSLATE**

ترجمہ کے لئے حاضر آئیڈیوں کے ساتھ انوباد کر رہا

يسعدنا توفير الترجمة MOŻEMY PRZETŁUMACZYĆ 很樂意翻譯

# SESplan

The Strategic Development Planning Authority  
for Edinburgh and South East Scotland

SESplan

Ground Floor, Claremont House

130 East Claremont Street

Edinburgh, EH7 4LB

Tel: 0131 524 5165

Email: [contactus@sesplan.gov.uk](mailto:contactus@sesplan.gov.uk)

Web: [www.sesplan.gov.uk](http://www.sesplan.gov.uk)



## Supplementary Guidance Submission - Technical Note



## Contents

1 Introduction	3
2 The Examination and SDP Strategy	5
3 Need and Demand and the Supply of Housing Land	7
4 The Housing Market	14
5 Infrastructure and Environmental Opportunities and Constraints Analysis	17
6 Defining Requirements	28
7 Delivery	32
8 Appendices	34
Appendix A - The Updated Spatial Strategy Assessment	34

## 1 Introduction

**1.1** This Technical Note supports the Supplementary Guidance on Housing Land which has been prepared under Section 22 of the Planning etc (Scotland) Act 2006 in connection with the Strategic Development Plan (SDP) for South East Scotland approved by Scottish Ministers with modifications on the 27 June 2013. The adopted Supplementary Guidance will form part of the development plan. The Technical Note will sit alongside the adopted Guidance providing the supporting evidence base.

### Purpose

**1.2** The purpose of the Technical Note is to provide the background evidence in support of the Supplementary Guidance on Housing Land. The Guidance has been prepared to provide detailed further information in support of SDP Policy 5 (Housing Land).

### Preparation

**1.3** The Technical Note outlines the analysis undertaken in support of the Supplementary Guidance, compliant with Policy 5, and contains the following:

- A summary of the relevant section of the Report of Examination and the context set by the approved plan;
- An outline of the need and demand for housing and the latest housing supply position;
- A commentary on the housing market;
- A summary of the analyses of opportunities and infrastructure and environmental capacity and constraints completed by SESplan;
- Consideration of the above and the definition of requirements; and
- Conclusions and commentary on issues in the delivery of the requirements.

**1.4** The following considerations have been taken into account in the preparation of the Supplementary Guidance:

1. A fresh analysis not only of opportunities, but also of infrastructure and environmental capacities and constraints;
2. A focus where possible on new housing development on brownfield land and on the scope for the thirteen Strategic Development Areas (SDA) to accommodate any additional land requirement; and
3. How much of the housing needs and demand assessed as being generated within the City of Edinburgh will require to be met in the other Local Development Plan (LDP) areas. As noted in paragraph 110 of the approved SDP, environmental constraints and other restrictions on land availability within the city's boundaries may mean that a significant proportion of these additional needs and demands must be met in the other five LDP areas. The establishment of this proportion has been informed by robust assessments of the scale of house completions which could be expected, in anticipation of economic recovery, from sites within the current housing land supply over each of these periods; and the most suitable locations for further housing land allocations based

## 1 Introduction

on an analysis of opportunities and of infrastructure and environmental capacities and constraints.

**1.5** This Technical Note has been prepared by SESplan in consultation with the six member authorities (City of Edinburgh, East Lothian, Fife, Midlothian, Scottish Borders and West Lothian).

## The Examination and SDP Strategy 2

### 2 The Examination and SDP Strategy

#### The Report of Examination

**2.1** The Report of Examination found that the SDP should address the housing requirements identified in the SESplan Housing Need and Demand Assessment (HNDA) for each of the plan periods in the SDP. As the SDP did not do this the provisions of the submitted plan relating to its housing land requirements were not consistent with Scottish Planning Policy (SPP) in important respects. The Reporters concluded that Supplementary Guidance should be produced. This requirement and modification to the SDP was upheld by Scottish Ministers.

**2.2** The Supplementary Guidance which is to be prepared, as required by SDP Policy 5 (Housing Land), will determine the scale of the housing requirements for the periods 2009 to 2019 and 2019 to 2024 which are to be delivered through site allocations in LDPs. As it is intended to establish the framework for new housing land allocations, the six LDPs should be consistent with this Supplementary Guidance.

#### Strategic Planning Considerations

**2.3** The Examination Report also required SESplan to be consistent with the approved strategy, vision and aims set out in the SDP when preparing the Supplementary Guidance and that the delivery of the Guidance contribute towards, and not conflict with, the delivery of the SDP aims. The delivery of the housing distribution in the Supplementary Guidance must contribute towards, and not conflict with, the delivery of the SDP aims.

**2.4** The approved aims of the SDP are set out below:

- Enable growth in the economy by developing key economic sectors, acting as the national hub for development and supporting local and rural development;
- Set out a strategy to enable delivery of housing requirements to support growth and meet housing need and demand in the most sustainable locations;
- Integrate land use and sustainable modes of transport, reduce the need to travel and cut carbon emissions by steering new development to the most sustainable locations;
- Conserve and enhance the natural and built environment;
- Promote green networks including through increasing woodland planting to increase competitiveness, enhance biodiversity and create more attractive, healthy places to live;
- Promote the development of urban brownfield land for appropriate uses;
- Promote the provision of improved infrastructure to enhance connectivity within the area, between the area and other parts of the UK and elsewhere to support economic growth and meet the needs of communities; and
- Contribute to the response to climate change through mitigation and adaptation and promote high quality design / development.

#### SPP Requirements

**2.5** Paragraph 38 of SPP sets out eight objectives of sustainable development that should be factored into the decisions on the location of development. These are reflected in the approved SDP aims and spatial strategy.



## 2 The Examination and SDP Strategy

**2.6** Paragraph 74 of SPP also requires *"sufficient land is available to meet the housing requirement for each housing market area in full, unless there are serious local environmental or infrastructure constraints which cannot be resolved to allow development within the life of the plan"*

**2.7** The distribution of the housing requirement must be deliverable. This is a key consideration set out in paragraph 77 of SPP when setting spatial strategies and in paragraph 80 on the location of housing.

## Need and Demand and the Supply of Housing Land 3

### 3 Need and Demand and the Supply of Housing Land

**3.1** This Section sets out the approach to calculating the need and demand for and supply of housing land within the SESplan area.

#### The Need and Demand for Housing

**3.2** Paragraph 67 of SPP states that HNDAs provide the evidence base for defining housing supply targets in Local Housing Strategies (LHSs) and allocating land for housing in development plans.

**3.3** Within the SESplan area, and at the commencement of the SDP preparation process, the three previous Structure Plan areas covering Edinburgh and the Lothians, Fife and the Scottish Borders had all produced relatively recent HNDAs. The agreed approach was therefore to update these local studies and commission an umbrella SESplan HNDA to align them (the SESplan HNDA is available for download at [http://www.sesplan.gov.uk/dev\\_plans/supportingdocs.html](http://www.sesplan.gov.uk/dev_plans/supportingdocs.html)). This approach was agreed with the Scottish Government and the Centre for Housing Market Analysis (CHMA). As detailed within the Housing Technical Note November 2011 (available for download at [http://www.sesplan.gov.uk/dev\\_plans.html](http://www.sesplan.gov.uk/dev_plans.html) and prepared in support of the Proposed Plan), the SESplan HNDA drew on the inputs and outputs from the individual studies and reviewed their findings.

**3.4** SPP also states that HNDAs should be undertaken at a functional housing market area level and consider the operation of the housing market as a whole, covering all tenures. Housing market areas are geographical areas where the demand is relatively self contained. Local authorities should define the housing market area or areas that will be used in defining housing requirements, recognising that they may overlap and rarely coincide with local authority boundaries.

**3.5** The SESplan HNDA, as agreed by CHMA and the Scottish Government and supported by the Reporter in the Report of the Examination, considered the SESplan area as one functional housing market area though it is acknowledged that there may be sub areas operating within that. This approach reflected evidence on the extent of the Edinburgh travel to work area which was a key factor in determining the boundary of SESplan. As the SESplan HNDA was based on a reconciliation of three local HNDAs that were themselves updates of existing studies, it was not practical to conduct research into the extent or workings of internal housing market areas. The decision was therefore taken that for strategic planning, the entire SESplan area should be treated as a single functional housing market area.

**3.6** The SESplan HNDA, which was signed off as robust and credible by the CHMA on the 7 June 2011, produced an estimate of need and demand for the entire SESplan area and for each of the six member authorities within the three plan periods 2009 - 2019, 2019 - 2024 and 2024 - 2032. These estimates are set out in Table 3.1 below.

### 3 Need and Demand and the Supply of Housing Land

**Table 3.1 Estimate of Need and Demand for Housing**

Member Authority	2009 - 2019	2019 - 2024	2024 - 2032
City of Edinburgh	34,290	14,200	22,505
East Lothian	5,210	2,740	3,820
Fife	16,260	7,400	10,363
Midlothian	1,700	500	171
Scottish Borders	5,955	2,780	3,802
West Lothian	11,420	5,090	7,338
<b>Total</b>	<b>74,835</b>	<b>32,710</b>	<b>47,999</b>
<b>Total 2009 - 2032</b>	<b>155,544</b>		

**3.7** All figures in Table 3.1 are taken from the SESplan HNDA (June 2011) and the SESplan Housing Technical Note (November 2011).

#### The Supply of Housing Land

**3.8** Each member authority within the SESplan area conducts an annual audit of housing land (the Housing Land Audit or HLA). The HLA includes all sites which are currently part of the established land supply. This includes;

- **Effective Land** - Land which is free or expected to be free of development constraints in the period under consideration, and will therefore be available for the construction of housing; and
- **Constrained Land** - Land which may be affected by infrastructure constraints, land contamination or ownership / marketing issues.

**3.9** In effect the established land supply includes both unconstrained and constrained sites. This includes the effective housing land supply, plus the remaining capacity for sites under construction, sites with planning consent, sites in adopted Local Plans and, where appropriate, other buildings and land with agreed potential for housing development.

**3.10** The approved SDP was prepared on the basis of the HLA 2010, which was the most up to date information available at the time of its preparation. Each of the member authorities have now prepared HLA 2012 and a summary of these is provided in Tables 3.2 - 3.8 below. Across the SESplan area, the output from all brownfield sites in the established supply has been reconsidered, to ensure that new housing is focused on brownfield land wherever possible. This has resulted in an additional 753 units in Edinburgh being reprogrammed from the 2024 - 2032 period to the 2019 - 2024 period. These additional units have been added into the established land supply along with the updated figures from HLA 2012.

## Need and Demand and the Supply of Housing Land 3

**3.11** An estimate of windfall sites has also been included within the tables below. Windfall in this regard has been defined as a site which becomes available for development during the plan period which was not anticipated to be available when the plan was prepared.

**3.12** Over the plan period it is likely that some of the current housing stock will be lost through demolitions. Such a loss is not directly taken into account by the demand forecasts within the SESplan HNDA but an allowance for demolitions should be made in calculating the established land supply. The tables below also note the number of house completions in each area over the period 2009 - 2012 since they contribute to the overall housing land supply. Completions 2009 -2012 and the impact of demolitions are described as 'other factors' in the tables below.

**Table 3.2 City of Edinburgh Established Land Supply and Other Factors**

	<b>2009 - 2019</b>	<b>2019 - 2024</b>	<b>2024 - 2032</b>
Effective Land Supply	7,612	5,589	4,469
Constrained Sites	2,039	2,066	2,193
Windfall	2,554	1,595	1,704
Completions 2009 - 2012	4,451	0	0
Demolitions	2,568	1,500	0
<b>Total (Effective, Constrained, Windfall and Completions Minus Demolitions)</b>	<b>14,088</b>	<b>7,750</b>	<b>8,366</b>

**Table 3.3 East Lothian Established Land Supply and Other Factors**

	<b>2009 - 2019</b>	<b>2019 - 2024</b>	<b>2024 - 2032</b>
Effective Land Supply	3,518	1,530	776
Constrained Sites	0	0	0
Windfall	220	110	110
Completions 2009 - 2012	1,107	0	0
Demolitions	0	0	0
<b>Total (Effective, Constrained, Windfall and Completions Minus Demolitions)</b>	<b>4,845</b>	<b>1,640</b>	<b>886</b>

### 3 Need and Demand and the Supply of Housing Land

**Table 3.4 Fife Established Land Supply and Other Factors**

	<b>2009 - 2019</b>	<b>2019 - 2024</b>	<b>2024 - 2032</b>
Effective Land Supply	7,053	5,246	3,406
Constrained Sites	557	279	446
Windfall	980	700	1,120
Completions 2009 - 2012	2,374	0	0
Demolitions	320	100	160
<b>Total (Effective, Constrained, Windfall and Completions Minus Demolitions)</b>	<b>10,644</b>	<b>6,125</b>	<b>4,812</b>

**Table 3.5 Midlothian Established Land Supply and Other Factors**

	<b>2009 - 2019</b>	<b>2019 - 2024</b>	<b>2024 - 2032</b>
Effective Land Supply	5,583	2,339	1,641
Constrained Sites	0	0	0
Windfall	400	320	340
Completions 2009 - 2012	1,294	0	0
Demolitions	0	0	0
<b>Total (Effective, Constrained, Windfall and Completions Minus Demolitions)</b>	<b>7,277</b>	<b>2,659</b>	<b>1,981</b>

**Table 3.6 Scottish Borders Established Land Supply and Other Factors**

	<b>2009 - 2019</b>	<b>2019 - 2024</b>	<b>2024 - 2032</b>
Effective Land Supply	5,779	883	0
Constrained Sites	1,595	1,139	0
Windfall	1,169	730	784
Completions 2009 - 2012	1,243	0	0
Demolitions	140	100	0

## Need and Demand and the Supply of Housing Land 3

	2009 - 2019	2019 - 2024	2024 - 2032
<b>Total (Effective, Constrained, Windfall and Completions Minus Demolitions)</b>	<b>9,646</b>	<b>2,652</b>	<b>784</b>

**Table 3.7 West Lothian Established Land Supply and Other Factors**

	2009 - 2019	2019 - 2024	2024 - 2032
Effective Land Supply	4,859	3,227	5,208
Constrained Sites	2,701	3,580	2,285
Windfall	480	400	640
Completions 2009 - 2012	1,302	0	0
Demolitions	568	100	160
<b>Total (Effective, Constrained, Windfall and Completions Minus Demolitions)</b>	<b>8,774</b>	<b>7,107</b>	<b>7,973</b>

**Table 3.8 SESplan Established Land Supply and Other Factors**

	2009 - 2019	2019 - 2024	2024 - 2032	2009 - 2032
Effective Land Supply	34,404	18,814	15,500	68,718
Constrained Sites	6,892	7,064	4,924	18,880
Windfall	5,803	3,855	4,698	14,356
Completions 2009 - 2012	11,771	0	0	11,771
Demolitions	3,596	1,800	320	5,716
<b>Total (Effective, Constrained, Windfall and Completions Minus Demolitions)</b>	<b>55,274</b>	<b>27,933</b>	<b>24,802</b>	<b>108,009</b>

### Housing Need and Demand and the Supply of Housing Land in 2012

**3.13** Table 3.9 compares estimates of need and demand across the SESplan area against the housing land supply, made up of the established supply and taking into account completions in 2009 - 2012, an allowance for windfall and demolitions, in each of the periods 2009 - 2019, 2019 - 2024 and 2024 - 2032. Tables 3.10 - 3.15 do the same for each of the LDP areas.

### 3 Need and Demand and the Supply of Housing Land

**Table 3.9 SESplan Need and Demand Compared to Established Supply and Other Factors**

	<b>2009 - 2019</b>	<b>2019 - 2024</b>	<b>2009 - 2024</b>	<b>2024 - 2032</b>	<b>2009 - 2032</b>
Need and Demand	74,835	32,710	107,545	47,999	155,544
Established Supply and Other Factors	55,274	27,933	83,207	24,802	108,009
<b>Balance</b>	<b>-19,561</b>	<b>-4,777</b>	<b>-24,338</b>	<b>-23,197</b>	<b>-47,535</b>

**Table 3.10 City of Edinburgh Need and Demand Compared to Established Supply and Other Factors**

	<b>2009 - 2019</b>	<b>2019 - 2024</b>	<b>2009 - 2024</b>	<b>2024 - 2032</b>
Need and Demand	34,290	14,200	48,490	22,505
Established Supply and Other Factors	14,088	7,750	21,838	8,366
<b>Balance</b>	<b>-20,202</b>	<b>-6,450</b>	<b>-26,652</b>	<b>-14,139</b>

**Table 3.11 East Lothian Need and Demand Compared to Established Supply and Other Factors**

	<b>2009 - 2019</b>	<b>2019 - 2024</b>	<b>2009 - 2024</b>	<b>2024 - 2032</b>
Need and Demand	5,210	2,740	7,950	3,820
Established Supply and Other Factors	4,845	1,640	6,485	886
<b>Balance</b>	<b>-365</b>	<b>-1,100</b>	<b>-1,465</b>	<b>-2,934</b>

**Table 3.12 Fife Need and Demand Compared to Established Supply and Other Factors**

	<b>2009 - 2019</b>	<b>2019 - 2024</b>	<b>2009 - 2024</b>	<b>2024 - 2032</b>
Need and Demand	16,260	7,400	23,660	10,363
Established Supply and Other Factors	10,644	6,125	16,769	4,812
<b>Balance</b>	<b>-5,616</b>	<b>-1,275</b>	<b>-6891</b>	<b>-5,551</b>

## Need and Demand and the Supply of Housing Land 3

**Table 3.13 Midlothian Need and Demand Compared to Established Supply and Other Factors**

	2009 - 2019	2019 - 2024	2009 - 2024	2024 - 2032
Need and Demand	1,700	500	2,200	171
Established Supply and Other Factors	7,277	2,659	9,936	1,981
<b>Balance</b>	<b>5,577</b>	<b>2,159</b>	<b>7,736</b>	<b>1,810</b>

**Table 3.14 Scottish Borders Need and Demand Compared to Established Supply and Other Factors**

	2009 - 2019	2019 - 2024	2009 - 2024	2024 - 2032
Need and Demand	5,955	2,780	8,735	3,802
Established Supply and Other Factors	9,646	2,652	12,298	784
<b>Balance</b>	<b>3,691</b>	<b>-128</b>	<b>3,563</b>	<b>-3,018</b>

**Table 3.15 West Lothian Need and Demand Compared to Established Supply and Other Factors**

	2009 - 2019	2019 - 2024	2009 - 2024	2024 - 2032
Need and Demand	11,420	5,090	16,510	7,338
Established Supply and Other Factors	8,774	7,107	15,881	7,973
<b>Balance</b>	<b>-2,646</b>	<b>2,017</b>	<b>-629</b>	<b>635</b>

**3.14** The HNDA provides estimates of need and demand. When the estimates of need and demand from the HNDA are compared against the supply of housing land across the SESplan area (as identified in HLA 2012 and taking account of completions in 2009 - 2012 and allowances for demolitions), as detailed in Table 3.9 above there is a shortfall in the supply of housing land of equivalent to 19,561 units in 2009 - 2019 and 4,777 units in 2019 - 2024. This is a total shortfall of 24,338 houses over the period to 2024.



## 4 The Housing Market

### 4 The Housing Market

**4.1** In identifying locations across the SESplan area which may be capable of accommodating additional strategic development, the Reporters acknowledged that for strategic planning purposes SESplan is considered as a single housing market area. This is because the SESplan area broadly reflects Edinburgh's travel to work area. However, it is also important to understand contextual information available on the demand for housing, particularly where the market for new housing is being generated within the single housing market area.

**4.2** This information helps to inform the definition of requirements in Section 6 of this Technical Note.

#### House Sales

**4.3** Recent research into house sales has been undertaken to inform the development of HNDA2. A draft report on this work is currently subject to consultation with the SESplan Housing Market Partnership. This analysis provides information on where home buyers in Edinburgh come from and where Edinburgh purchasers move to within the SESplan area. It is important to understand that this research has occurred before the completion of significant infrastructure improvements, such as Borders Rail, which could impact on the distribution of housing sales.

**4.4** The following paragraphs summarise the main findings of this draft work.

**4.5** The analysis highlights that the influence of Edinburgh extends into each of the six member authority areas along radial strategic transport corridors. However, the majority of sales in Edinburgh (around 90%) are to buyers who already live in the City, with the remaining 10% to buyers from surrounding areas (mostly East Lothian, Midlothian and West Lothian, with less from Fife and the Scottish Borders). Of those that move from the City to surrounding areas, the majority move to East Lothian, followed by Midlothian, West Lothian, then Fife and the Scottish Borders.

**4.6** There are stronger relationships with adjoining / nearby areas than with more distant ones, with movement tending to be towards those with greater populations or along or close to strategic transport corridors or the City itself. This pattern of movement is strongest in the west between West Lothian and Fife and in the east between East Lothian, Midlothian and the Scottish Borders. Very few moves occur between the east and west of the SESplan area. This would seem to reflect the linear nature of strategic transport corridors to and from Edinburgh, the physical barrier to direct movement across the City region presented by the Pentland Hills Regional Park, the single road based transport corridor around the City, and the more local network of movements between neighbouring towns.

**4.7** East Lothian would appear to have a significant housing market relationship with the City. It is therefore under considerable pressure for housing development. East Lothian has the highest number of house sales by people moving out of Edinburgh, and is second only

## The Housing Market 4

to Midlothian in terms of the percentage of house sales that are to Edinburgh purchasers. Most moves are within the western sector of East Lothian, indicating that this is the most pressurised area.

**4.8** Interestingly, East Lothian also has, by some margin, the greatest number of house sales by its residents purchasing within Edinburgh. This suggests that house prices in East Lothian are more comparable with those in Edinburgh, such that a move into the City from East Lothian is an affordable one for many.

**4.9** Sales within Fife, are second only to the sales volume in Edinburgh. Around 3.9% of purchasers from Edinburgh buy in Fife, with the large majority of these moving to west Fife. However, overall the number of Edinburgh purchasers is a relatively small proportion of all moves within Fife. Very few purchasers move from Fife to Edinburgh.

**4.10** Within Midlothian, the impact of sales to Edinburgh purchasers is identified as very significant, with 32% of all sales being to Edinburgh purchasers. This may have an impact on house prices with implications for locally derived need and demand.

**4.11** The majority of Edinburgh purchasers who move to the Borders relocate to the Central and Northern Borders areas. Of all sales in the Borders 11% originate from Edinburgh. This proportion may increase with the future opening of Borders Rail. The highest percentage of purchasers moving to Edinburgh from the Scottish Borders originated from the Northern Borders area (16%). The Northern Borders area includes Peebles, Cardrona and Innerleithen and is in close proximity to Edinburgh for commuters and near to transport links to the City Centre. The number of sales moving to Edinburgh from the Borders or moving from the Borders to Edinburgh is relatively low. Within the Borders there is a very restricted housing market which has limited potential to attract purchasers from Edinburgh.

**4.12** West Lothian has a high level of self-containment. Inward migration is highest from Edinburgh (4.1%), followed by movements from Midlothian (2.9%). In migration is lowest from the Scottish Borders. The highest rate of in-migration to West Lothian from Edinburgh is to the area around Livingston including "The Calder", Winchburgh, Broxburn and Uphall. This could be reflective of wider employment opportunities within this area, notably Livingston. Further westwards (Bathgate, Boghall, Whitburn, Armadale, Fauldhouse), the level of inward migration reduces; similarly few purchasers within these locations move to Edinburgh.

### House Completions

**4.13** The housing market has changed in recent years and what has occurred in the past may not be reflective of future demand. Many of Edinburgh's completions, prior to the credit crunch, were on large, high density brown field sites. Those same sites have stalled as demand has shifted towards a different market. This is reflected in the completions data set out in Table 4.1 below. However, it is expected that this market will recover in the future.

**4.14** Table 4.1 shows average annual completion rates for periods since 2004. It also sets out what average annual completions rate will be required from 2009 to 2024 to deliver the established land supply.

## 4 The Housing Market

**Table 4.1 Historic Average Annual Completions 2004 - 2012 and Established Land Supply**

Local Development Plan	2004 - 2008	2008 - 2012	2004 - 2012	Established Land Supply 2009 - 2024 Required Average
City of Edinburgh	2,445	1,753	2,099	1,406
East Lothian	636	363	499	432
Fife	1,384	870	1,127	1,118
Midlothian	236	507	372	662
Scottish Borders	566	464	515	820
West Lothian	1,026	431	729	1,059
<b>SESplan</b>	<b>6,293</b>	<b>4,388</b>	<b>5,341</b>	<b>5,497</b>

**4.15** While housing completion rates reflect the availability of marketable housing land, over a period of time they give some indication of an area's capacity to deliver house completions. The figures detailed in Table 4.1 demonstrate the impact of the recession and the current economic climate. Across the SESplan area, completions peaked at just over 6,500 in the period 2007 / 2008. The eight year (2004 - 2012) average, including the pre-recession years with high rates of delivery, now stands at just 5,341 units per annum. This rate of delivery would still be short of delivering the established land supply by 2024, before any additional allowances to deliver the HNDA requirement to 2024 are identified.

**4.16** A step change in the level of housing completions by house builders will be required to deliver the housing requirement over the period 2009 - 2024 (average of 7,180 dwellings per annum). At the time of preparing the Proposed Plan, the house building industry estimated that it would take 10 years to recover back to the levels experienced in 2007 / 2008. Deliverability has to be a consideration informing the housing land requirement distribution in the Supplementary Guidance. Subject to analysis of environmental and infrastructure constraints, on comparing historic completion rates to established land supply required completion rates, there is capacity within City of Edinburgh to deliver additional allowances. It has an historic average delivery rate in excess of 2,000 units per annum. Provided a step change in delivery occurs in the next decade, further allowances could also be delivered in East Lothian, Fife, and to a lesser extent West Lothian. Within Midlothian, the current delivery programme from previous local plans and the allowances from the approved SDP is challenging. Further extensive allowances within this LDP area may not be deliverable.

## Infrastructure and Environmental Opportunities and Constraints Analysis 5

### 5 Infrastructure and Environmental Opportunities and Constraints Analysis

**5.1** Paragraph 111 of the approved SDP states "*Consistent with SPP and with achieving sustainable development, priority in allocating new sites for housing development should be given to brownfield sites within existing built up areas. Where additional land is required, sites should first be sought within the 13 identified SDAs, as shown in Table 3, to assist in implementing this plan's locational strategy.*" The thirteen SDAs remain unchanged from the approved SDP and are as follows:

- North Dunfermline;
- Ore / Upper Leven Valley;
- West Lothian;
- West Edinburgh;
- South East Edinburgh;
- Edinburgh City Centre;
- Edinburgh Waterfront;
- A7 / A68 / Borders Rail Corridor (Midlothian);
- A701 Corridor (Midlothian);
- East Lothian;
- Eastern Borders;
- Central Borders; and
- Western Borders.

**5.2** Policy 5 (Housing Land) of the approved SDP sets out that the Supplementary Guidance will be based on a fresh analysis of opportunities and of infrastructure and environmental constraints. The first step in this analysis was to use the framework of the Spatial Strategy Assessment prepared to support the approved SDP. This would be refreshed to take into account up to date information.

#### Refresh of the Spatial Strategy Assessment

**5.3** The Spatial Strategy Assessment undertaken in November 2011 <sup>(1)</sup> provides an explanation of the methodology used to identify the preferred locations for development within the SDP. These preferred areas underpinned the identification of 13 SDAs, building on the work done to inform the Main Issues Report (MIR). The Assessment was also closely linked to the Strategic Environmental Assessment (SEA) and took account of comments made through the MIR consultation process.

**5.4** The methodology for undertaking the Spatial Strategy Assessment set out a two Stage process. The Stage 1 Assessment considered the whole of the SESplan area identifying areas where development on a strategic scale would not be acceptable. Essentially this Assessment 'sieved' out parts of the SESplan area on the basis of international and national

1 available at [http://www.sesplan.gov.uk/dev\\_plans.html](http://www.sesplan.gov.uk/dev_plans.html)

## 5 Infrastructure and Environmental Opportunities and Constraints Analysis

environmental designations and public transport accessibility. The remainder of the SESplan area was then subdivided into 30 Strategic Assessment Areas (SAAs) and each considered against a range of criteria through the Stage 2 Assessment.

**5.5** The refresh therefore concentrates on the Stage 2 Assessment and the updating of information related to the following seven criteria. A summary of the changes recorded in the refreshed assessments is set out below. This summary should be read in conjunction with Appendix A.

- I. **Accessibility** - The accessibility assessment was still considered robust and a further re-run of the model was not required. This looked to assess each of the 30 areas accessibility by public transport and private car. Each of the 30 SAAs were given a regional and local accessibility ranking based on accessibility and journey times to employment, services, retail and leisure. This also factored in congestion and constraints in the transport network as this would be reflected in journey times. The high ranking locations were those that are well served by public transport or accessible by walking or cycling, thereby reducing the need to travel by private car, reducing the impact on CO2 emissions and air quality, and encouraging the use of more sustainable modes of transport. Those higher ranking areas would be considered more suitable for additional development. Full details on this accessibility analysis is set out in the Transport Technical Note for the approved SDP.<sup>(2)</sup>
- II. **Infrastructure Capacity** - In terms of education, the proposed schools at Kirkcaldy East and Glenrothes will not increase capacity. A constraint applies across West Lothian until new secondary schools are provided at Winchburgh and East Calder. There are also capacity constraints at Armadale, Bathgate and Whitburn. Kelso High is unsuitable for future use and a replacement will be required. To inform the preparation of the LDP, Midlothian is seeking views on a new secondary school to serve Shawfair (and potentially parts of East Lothian) rather than extend Dalkeith High. Musselburgh Grammar has the potential to expand significantly beyond current commitments but this would require substantial demolition and rebuild. Catchment reviews and school extensions across West Lothian could be undertaken to provide additional capacity, with a review of the Fife school estate ongoing. In terms of water and drainage, there are capacity issues across West Lothian and some limits in capacity in the Southern Borders and West Linton area, but Scottish Water advise that such concerns should not prevent a site being excluded from emerging development plans and that they will work with interested parties to find a solution.
- III. **Land Availability and Development Capacity** -The refresh highlights that there is the potential for development within Fife West, the Dunfermline area and Glenrothes / Kirkcaldy. There is limited capacity within Fife South beyond current local plan allocations. Substantial allocations for development exist in West Lothian with limited opportunities for further growth due to secondary school constraints. The Midlothian LDP considers two options for South East Edinburgh and limited reasonable alternatives within the A7 / A68 Borders Rail Corridor and A701 Corridor, but there is no scope for additional development in the period to 2024. There is no scope for strategic growth within the Rural South Lothian area. Within East Lothian West there are a number of

2 This is available at [http://www.sesplan.gov.uk/dev\\_plans.html](http://www.sesplan.gov.uk/dev_plans.html)

## Infrastructure and Environmental Opportunities and Constraints Analysis 5

significant existing allocations which remain undeveloped, but there are a number of options to accommodate further future development. This could include Musselburgh to the west and east and Longniddry to the south. There are also some potential opportunities to the south east of Dunbar. There is limited scope for further development across the Scottish Borders taking into account existing supply and marketability factors.

- IV. **Green Belt** - The Green Belt designated to the south west of Dunfermline is now included within the adopted Dunfermline and West Fife Local Plan (Nov 2012). Midlothian have identified sites within South East Edinburgh as both potential and alternative options despite the Green Belt Study not identifying any areas with landscape capacity for development. There is no scope to remove further Green Belt without seriously impacting on the landscape setting of the Shawfair development. The MIR for the Midlothian LDP also identifies releases from the Green Belt in the A7 / A68 Borders Rail Corridor and A701 Corridor.
- V. **Landscape Designations** - In line with Scottish Natural Heritage (SNH) guidance, each of the member authorities have undertaken an assessment of local landscape areas. Areas have been designated to the north of Saline, to the north and south of Dunfermline and to the north of Glenrothes. West Lothian has undertaken a review of local landscape designations which will be reported to Committee in late 2013. Midlothian is consulting on changes to local landscape designations, but these are minimal and none would provide scope for development. A wholesale review of local landscape designations has been undertaken across the Scottish Borders.
- VI. **Regeneration Potential** - No substantial changes since the original assessment was undertaken.
- VII. **Prime Agricultural Land** - No changes since the original assessment was undertaken.

**5.6** In line with the Scottish Ministers modifications an additional criteria on transport has been added allowing for the detailed transportation information to be broken down spatially across the SESplan area.

- VIII. **Transport** - An updated list of constrained infrastructure for each of the 30 SAAs was created. This was informed by the transport appraisal for the SDP. Predicted future impacts were also included to inform the location of development. The updated assessment for each SAA is set out in Appendix A.

**5.7** During the preparation of the Supplementary Guidance, discussions have taken place with Transport Scotland on cumulative impacts of development and transport appraisal of the Supplementary Guidance. The Action Programme accompanying the SDP has been updated and now includes an initial assessment used to inform LDPs on which SDAs have a relationship with the strategic infrastructure requirements of the SDP. Following discussion on the transport appraisal, the distribution of housing in the Supplementary Guidance will be used in the SESplan regional transport model to assess the transport consequences of the housing distribution. This can then be compared with previous transport appraisal and can inform the LDP preparation process.

## 5 Infrastructure and Environmental Opportunities and Constraints Analysis

**5.8** On completion of the refresh of each of the criteria, the outcomes were summarised for each of the 30 assessment areas (See Appendix A). As in the original assessment, greater weight was given to accessibility, infrastructure and land. These have been used to inform the analysis of housing and development capacity for each LDP area set out below.

### Analysis of Capacity

**5.9** As set out above and within SDP Policy 1A (The Spatial Strategy Development Locations) and SDP paragraph 22, where capacity for development exists, LDPs will focus new housing on brownfield land and across the thirteen SDAs.

**5.10** Following the refresh of the Spatial Strategy Assessment, each member authority determined that the capacity that made up the additional allowances (the phasing may have been amended) included in Tables 3 and 4 of the Proposed Plan (detailed in table 5.1 below) were still robust to contribute to meeting the SESplan housing requirement to 2024. This included 850 units outside SDAs, the locations of which are considered compliant with SDP Policies 5 (Housing Land) and 7 (Maintaining a Five Year Housing Land Supply). In preparing this Supplementary Guidance, no significant new brownfield housing opportunities have been identified.

**Table 5.1 Additional Allowances set out in Tables 3 and 4 of the Proposed Plan**

LDP Area	SDA	2009 - 2019	2019 - 2024
City of Edinburgh	South East Edinburgh	500	500
	West Edinburgh	1,000	1,000
East Lothian	East Lothian	0	750
Fife	Dunfermline North	0	500
	Ore / Upper Leven Valley	0	500
	Development Outwith SDAs (Fife)	600	200
Midlothian	South East Edinburgh	100	350
	A7 / A68 / Borders Rail Corridor	350	900
	A701 Corridor	250	500
Scottish Borders	Eastern Borders	0	50
	Central Borders	0	200
	Western Borders	0	100
	Development Outwith SDAs (Scottish Borders)	0	50

## Infrastructure and Environmental Opportunities and Constraints Analysis 5

LDP Area	SDA	2009 - 2019	2019 - 2024
West Lothian	West Lothian	500	1250
<b>Totals</b>		<b>3,300</b>	<b>6,850</b>

**5.11** As demonstrated in Table 5.2 below combining the additional allowances of the Proposed Plan with the Established Land Supply and Other Factors gives a total of 93,357 units over the period to 2024. In order to fully meet the HNDA requirements up to 2024, land for another 14,188 houses (over and above the Additional Allowances included in the Proposed Plan) will be needed across the SESplan area.

**Table 5.2 Comparison of Proposed Plan Allowances and Established Land Supply and Other Factors and HNDA**

	2009 - 2019	2019 - 2024	2009 - 2024
Proposed Plan Allowances	3,300	6,850	10,150
Established Land Supply and Other Factors	55,274	27,933	83,207
<b>Total</b>	<b>58,574</b>	<b>34,783</b>	<b>93,357</b>
HNDA	74,835	32,710	107,545
<b>Comparison of Total Proposed Plan Allowances and Established Land Supply and Other Factors with HNDA</b>	<b>-16,261</b>	<b>2,073</b>	<b>-14,188</b>

**5.12** All figures are taken from Tables 3.1, 3.8 and 5.1.

**5.13** Following this stage the task was to:

1. Identify how much further development could be identified within the SDAs to make up the shortfall; and
2. Once the SDAs were maximised, identify which other SAA's could accommodate further development sustainably. This is in accordance with SDP paragraphs 113 and 116.

**5.14** This process was carried out in consultation with the member authorities combining the refreshed Spatial Strategy Assessment of opportunities and constraints and housing site assessment work undertaken for each LDP. In completing this assessment within the timescale set for the preparation of the Supplementary Guidance, SESplan and the member authorities acknowledged that LDPs are at different stages in the plan preparation process. This process is summarised below for each member authority. Following the summary of the process for each LDP Area, a table shows the additional development capacity over the Established Land Supply. This includes the additional allowances previously set out in the Proposed SDP.



## 5 Infrastructure and Environmental Opportunities and Constraints Analysis

### City of Edinburgh

**5.15** Edinburgh is at the strategic centre of the SESplan area and is already delivering a large supply of housing. A key challenge in Edinburgh is balancing the need to maintain a green belt for the purposes set out in SDP Policy 12 whilst ensuring housing requirements are met. It will require significant infrastructure investment to accommodate development particularly transport and education. The Proposed Edinburgh LDP (March 2013) is accompanied by an Environmental Report, Transport Assessment, Education Assessment and Proposed Action Programme. These documents provide information on infrastructure and environmental capacities and constraints and the mitigation required to support the levels of development proposed at that time.

**5.16** An assessment of potential brownfield opportunities concluded that there were no additional significant sites. However, there is potential for existing brownfield sites to make an increased contribution to the housing land supply in the period up to 2024. Taking account of the expected upturn in delivery rates, there is the possibility of brownfield development coming forward earlier than previously envisaged. 750 units have been reprogrammed.

### Within SDAs

**5.17** The Spatial Strategy Assessment identified four SDAs within the City of Edinburgh. Two (West Edinburgh and South East Edinburgh) were identified as having the potential to accommodate further strategic development. The Proposed Plan required the allocation of land for 2,000 houses in West Edinburgh and 1,000 houses in South East Edinburgh up to 2024. Sites to meet these requirements are identified in the City of Edinburgh Council's Proposed LDP.

**5.18** No new significant housing opportunities have been identified in the Edinburgh City Centre and Edinburgh Waterfront SDAs. The capacity of the West Edinburgh and South East Edinburgh SDAs have been considered further to ensure that the Supplementary Guidance supports the approved SDP spatial strategy by continuing to focus development within the existing SDAs. The comprehensive assessment undertaken by the Proposed LDP demonstrates that all land within the two SDAs has been considered for new development. There may be potential for additional housing on sites identified in the Proposed LDP, by looking again at the density of development. The potential for additional sites has also been considered based on an analysis of opportunities and infrastructure and environmental capacities and constraints. South East Edinburgh, in particular could have capacity for additional housing sites. Based on this analysis, it is considered that West Edinburgh could accommodate around 2,700 units and the Edinburgh part of the South East Edinburgh SDA could provide for 2,500 units.

### Outwith SDAs

**5.19** Following the review of the Spatial Strategy Assessment, there have been no significant amendments to the previous assessment in the Edinburgh SAAs. The refresh of the Spatial Strategy Assessment confirms that Areas 12 (South Edinburgh), 15 (North East Edinburgh) and 17 (North Edinburgh) have limited or no capacity for strategic growth.

## Infrastructure and Environmental Opportunities and Constraints Analysis 5

**5.20** The revised Spatial Strategy Assessment identifies two assessment areas that whilst not identified as SDAs, have the potential to accommodate development on a strategic scale, North West Edinburgh (Area 9) and South West Edinburgh (Area 11). An assessment of potential opportunities and constraints has been undertaken to inform the Supplementary Guidance and this suggests that these areas could accommodate around 2,500 units if housing land is required outwith SDAs.

**Table 5.3 Additional Development Capacity in the City of Edinburgh**

<b>Additional Development Capacity</b>	
West Edinburgh SDA	2,700
South East Edinburgh SDA	2,500
Outwith SDAs	2,500
<b>Total</b>	<b>7,700</b>

### East Lothian

**5.21** East Lothian is a fast growing area but many of its towns are becoming dormitory settlements as the new housing is not accompanied by employment opportunities. This has implications for traffic and travel including increased pressure and congestion on key routes.

**5.22** As part of the East Lothian LDP preparation process, a call for sites was undertaken. This resulted in the submission of around 140 sites for consideration. Four included some employment, whilst the remainder were whole scale housing led developments. Without determining sites to be included in the East Lothian LDP, these submissions have informed East Lothian's potential level of additional development that could contribute towards the SESplan housing requirement.

### Within SDAs

**5.23** One large SDA covers the majority of East Lothian. There is the potential for Green Belt release on the eastern edge of the Edinburgh Green Belt, but such release would significantly weaken the setting and separate identities of Prestonpans, Musselburgh and Wallyford. Existing settlements already have large amounts of growth allocated to them and there are limited brownfield opportunities within East Lothian. An education solution for Musselburgh is required to be identified. The LDP will seek to identify opportunities along rail corridors, but there are issues related to local stopping services along the East Coast Main Line due to its intercity nature.

### Outwith SDAs

## 5 Infrastructure and Environmental Opportunities and Constraints Analysis

**5.24** North Berwick is located outside the SDA. Further development opportunities in this area for the plan period are very limited due to infrastructure constraints and the programming of the upgrade of the waste water treatment works. The area south of the SDA is considered unsustainable for strategic development as it is made up of important landscapes, small isolated hamlets and individual dwellings. Access and services in this area are poor.

**5.25** In summary, East Lothian has some additional capacity to take further development, the location of which will be identified through the LDP process. Due to constraints this would be most suitably located within the SDA. Note that any additional capacity would require a significant step change in housing delivery levels over recent rates alongside required infrastructure provision.

**Table 5.4 Additional Development Capacity in East Lothian**

<b>Additional Development Capacity</b>	
East Lothian SDA	3,560
<b>Total</b>	<b>3,560</b>

### Fife

**5.26** Fife has an up to date development plan with Local Plans setting out a generous supply to 2026. This is based on a Structure Plan approved in 2009 and two Local Plans which were approved in 2011 and 2012. Sites submitted through the Fife LDP call for sites were assessed for their impact on infrastructure, environmental considerations including the place making agenda. A workshop took place involving key agencies and Fife Council services to identify the best strategy for the area, given the large increase in housing numbers. From this exercise a capacity across the SESplan part of Fife has been identified. The site capacity has been used to guide the development of a proposed requirement for the SESplan part of Fife. Due to Fife looking to meet a high level of requirement there will be little scope for the LDP process to offer a reasonable alternative to the housing land allocations proposed.

### Within SDAs

**5.27** The SDP looks to augment the existing strategy provided in the Fife plans and focuses large and medium scale development in the Ore / Upper Leven Valleys and North Dunfermline. Through the analysis set out above there is theoretical capacity to accommodate an additional 5,850 dwellings within the SDAs.

### Outwith SDAs

**5.28** Locations outwith the identified SDAs are considered to provide the flexibility recommended by the SDP. Following the analysis, 1,950 units could be accommodated outwith SDAs.

**5.29** As in other SESplan authorities, there are constraints on the ability of the existing and potential future education infrastructure to accommodate additional capacity. Delivery of additional allowances will also require a step change in housing completions.

## Infrastructure and Environmental Opportunities and Constraints Analysis 5

**Table 5.5 Additional Development Capacity in Fife**

<b>Additional Development Capacity</b>	
North Dunfermline SDA	2,630
Ore / Upper Leven Valley SDA	3,220
Outwith SDAs	1,950
<b>Total</b>	<b>7,800</b>

### Midlothian

**5.30** Midlothian currently has a large supply of sites from previous local and structure plans and is currently preparing its LDP. Around 80 sites were submitted to Midlothian Council as part of the Midlothian LDP process. This process has informed the analysis of potential additional capacity.

**5.31** Most of Midlothian is covered by SDAs which include all of the major settlements. The area outside SDAs is in the south of the authority area, which is primarily rural with only very small hamlets / settlements which are poorly served by public transport / facilities. They are therefore not suitable for strategic development.

**5.32** There are significant constraints to further development in Midlothian's SDAs. There are significant constraints imposed by topography as the Esk Valley bisects the Council area and curtails cross-district movement. The major routes are radial towards Edinburgh and are experiencing increasing congestion, particularly at the junctions on the City Bypass and at local pinch points. Whilst Borders Rail will provide sustainable travel opportunities for new development, sites have already been allocated along this route to promote these opportunities.

**5.33** Through the level of proposals already identified in the development plan, settlements in Midlothian are expected to grow by one third to one half in terms of household numbers in the period to 2024. This is leading to significant pressure on delivering additional school places which will limit further development that could be accommodated up to that date.

**5.34** The Midlothian MIR identifies a small number of 'reasonable alternative' sites but these would not deliver additional housing in the period covered by the Supplementary Guidance. Due to the constraints set out above, and within SDAs it is expected that a further 100 dwellings could be accommodated and potentially delivered in the plan period to 2024. Delivery of the existing land supply and additional allowances will require a significant step change in delivery levels.

**Table 5.6 Additional Development Capacity in Midlothian**

<b>Additional Development Capacity</b>	
South East Edinburgh SDA	450

## 5 Infrastructure and Environmental Opportunities and Constraints Analysis

<b>Additional Development Capacity</b>	
A7 / A68 / Borders Rail Corridor SDA	1,350
A701 Corridor SDA	750
<b>Total</b>	<b>2,550</b>

### Scottish Borders

**5.35** Within SDP1 there is no support from the Scottish Government for future road improvement projects within the Borders including dualling of the A1 carriageway nor for a new rail station proposed at Reston on the East Coast Main Line. These interventions, if successful, could open further opportunities to support new development and enhance links to the rest of the region. As with Midlothian, there is some limited potential for further development resulting from the reinstatement of the Borders Railway. However, additional housing land within the Central Borders SDA has already been allocated to support this.

**5.36** Progress on the Scottish Borders LDP is significantly advanced. This has allowed an analysis of all submitted sites involving a detailed site assessment process and incorporated an SEA process. The majority of sites are being taken forward in the LDP.

**Table 5.7 Additional Development Capacity in Scottish Borders**

<b>Additional Development Capacity</b>	
Eastern Borders SDA	160
Central Borders SDA	290
Western Borders SDA	110
Outwith SDAs	80
<b>Total</b>	<b>640</b>

### West Lothian

**5.37** The West Lothian area is divided into three Strategic Assessment Areas (Area 6 M9 Corridor, Area 7 west West Lothian and Area 8 M8 Corridor) principally along the lines of transport corridors and previous Core Development Areas set out within the Edinburgh and Lothians Structure Plan. The decision was taken to amalgamate the three SAAs into one SDA to allow maximum flexibility for the LDP and to meet existing education requirements. Based on existing development and allowances there is a requirement for three additional secondary schools that are proving challenging to deliver. Providing additional school places are a key constraint on further development.

## Infrastructure and Environmental Opportunities and Constraints Analysis 5

**5.38** West Lothian is highly accessible with three rail corridors and two motorways but Transport Scotland, through consultation on the LDP site submissions has advised that they may have concerns over the cumulative impact of development on the M8 and M9 and associated junctions, particularly Newbridge. A new rail station at Winchburgh, could assist in the delivery of more sustainable travel patterns in West Lothian.

**5.39** The call for sites undertaken to inform the West Lothian LDP yielded significant amounts of land. These sites have been assessed and filtered to take into account environmental and infrastructure constraints and council aspirations regarding community regeneration and council house build programme. The West Lothian LDP has also been informed by discussions with Homes for Scotland who advised that there is a limited market in the west of West Lothian (Area 7) despite the existing Armadale Core Development Area. There is a market along the M9 Corridor (Area 6) in settlements including Linlithgow, Livingston and Winchburgh, but there remains issues of infrastructure and environmental constraints.

**5.40** The scale of existing housing commitments in West Lothian and the delivery of associated essential infrastructure needed to support this growth is already challenging. Additional development will require significant levels of investment to deliver the infrastructure required to support growth beyond that already committed. If this was not forthcoming then the development could not be delivered within the plan period.

**Table 5.8 Additional Development Capacity in West Lothian**

<b>Additional Development Capacity</b>	
West Lothian SDA	2,130
<b>Total</b>	<b>2,130</b>

## 6 Defining Requirements

### 6 Defining Requirements

**6.1** To determine the housing land requirement by LDP area, the information on need and demand, the supply of housing land at 2012 and information on the housing market and the analyses of infrastructure and environmental capacities and constraints set out in Sections 3 - 5 of this Technical Note have been considered. Informed by these analyses, this section defines housing land requirements for inclusion in the Supplementary Guidance.

#### Demand and Supply

**6.2** As detailed in Section 3, the need and demand for housing has been identified through the HNDA. Taking the figures from Table 3.1 above, Table 6.1 below illustrates that the total need and demand over the period to 2024 is 107,545 units. The supply of housing is made up of effective, constrained and windfall sites which together with an allowance for completions and demolitions make up the established land supply and other factors. Again taking the figures from Tables 3.2 - 3.8 above, Table 6.1 below illustrates that the total established supply is 83,207 units. Comparing the total need and demand with the total established supply results in a shortfall of 24,338 units.

**Table 6.1 Need and Demand and Established Land Supply (and Other Factors)**

		<b>2009 - 2019</b>	<b>2019 - 2024</b>	<b>2009 - 2024</b>
<b>Need and Demand</b>	City of Edinburgh	34,290	14,200	48,490
	East Lothian	5,210	2,740	7,950
	Fife	16,260	7,400	23,660
	Midlothian	1,700	500	2,200
	Scottish Borders	5,955	2,780	8,735
	West Lothian	11,420	5,090	16,510
	<b>SESplan</b>	<b>74,835</b>	<b>32,710</b>	<b>107,545</b>
<b>Established Land Supply and Other Factors</b>	City of Edinburgh	14,088	7,750	21,838
	East Lothian	4,845	1,640	6,485
	Fife	10,644	6,125	16,769
	Midlothian	7,277	2,659	9,936
	Scottish Borders	9,646	2,652	12,298
	West Lothian	8,774	7,107	15,881
	<b>SESplan</b>	<b>55,274</b>	<b>27,933</b>	<b>83,207</b>

## Defining Requirements 6

	2009 - 2019	2019 - 2024	2009 - 2024
<b>Comparison of SESplan Need and Demand with Established Land Supply and Other Factors</b>	<b>-19,561</b>	<b>-4,777</b>	<b>-24,338</b>

### Additional Allowances

**6.3** The Aims of the approved plan, including ‘*reducing the need to travel*’ and ‘*enabling delivery of housing requirements...to meet need and demand in the most sustainable locations*’ give further guidance to defining requirements by LDP area. The aim to reduce the need to travel supports the principle of meeting need and demand close to where they arise and relating requirements to the main centres of employment. The aim of ‘enabling delivery’ indicates that consideration should be given to the deliverability of housing in the area when defining requirements.

**6.4** On the basis of the considerations above, and the capacity analysis undertaken in Section 5, Table 6.2 below sets out that the distribution of additional allowances by SDA to meet the shortfall of 24,338 units over the period to 2024.

**Table 6.2 Additional Allowances Within and Outwith Strategic Development Areas**

Strategic Development Area	Additional Allowances
West Edinburgh	2,700
South East Edinburgh	2,950 (2,500 in City of Edinburgh and 450 in Midlothian)
Edinburgh City Centre	0
Edinburgh Waterfront	0
East Lothian	3,560
North Dunfermline	2,630
Ore / Upper Leven Valley	3,220
A7 / A68 / Borders Rail Corridor	1,350
A701 Corridor	750
Eastern Borders	160
Central Borders	290
Western Borders	110
West Lothian	2,130



## 6 Defining Requirements

<b>Strategic Development Area</b>	<b>Additional Allowances</b>
<b>Outwith Strategic Development Areas</b>	<b>Additional Allowances</b>
City of Edinburgh	2,500
Fife	1,950
Scottish Borders	80
<b>SESplan</b>	<b>24,380</b>

**6.5** All figures have been rounded to the nearest 10.

### The Housing Land Requirement

**6.6** Firstly, the distribution of the Housing Land Requirement must be in accordance with the SESplan Spatial Strategy set out in the approved SDP. It builds on existing committed development, focusing further development along preferred corridors optimising connectivity and access to services and jobs.

**6.7** SPP indicates need and demand for housing should be met, where possible, in the housing market area where it has arisen. SPP notes however that if there are serious local environmental or infrastructure constraints which can not be resolved to allow development within the life of the plan, a proportion of the housing requirement may be met in another housing market area within the plan area; and that wider social, economic and environmental policy objectives should be taken into account when directing development to locations, and past trends need not be followed. SPP also encourages an approach to the distribution of housing requirements which is sensitive to the way the housing market functions.

**6.8** The SDP considers the area as one housing market area but it is acknowledged that sub markets are likely to operate within the area, as noted in the Report of Examination (Issue 15 para 31 – 32). Housing Market Area analysis in preparation for SDP2, described in Section 4, confirms the SESplan area is Edinburgh's Functional Housing Market Area, but also identifies sub-market areas. This work also notes that the relationship between Edinburgh and the adjoining sub-market areas is stronger than that between the City and more distant sub-market areas. The analysis is subject to consultation with the SESplan Housing Market Partnership but it does offer understanding of how the housing market operates within the area and can be used to inform the definition of housing requirements in line with SPP.

**6.9** In this context, it is proposed that requirements are set for each LDP which ensure that need and demand are met as far as practical in areas close to where that arises, taking into account the analyses outlined in section 5. LDP areas are not considered to be housing market areas and are unlikely to align with sub market areas however this approach is consistent with the principles underpinning SPP.

**6.10** On the basis of the figures detailed in Tables 6.1 and 6.2 above, it is proposed that the Supplementary Guidance indicates that LDPs will meet the housing land requirements set out in Table 6.3 below. All figures have been rounded to the nearest 10.

## Defining Requirements 6

**Table 6.3 Housing Land Requirement by LDP Area**

<b>LDP</b>	<b>2009 - 2019</b>	<b>2019 - 2024</b>
City of Edinburgh	22,300	7,210
East Lothian	6,250	3,800
Fife	17,140	7,430
Midlothian	8,080	4,410
Scottish Borders	9,650	3,280
West Lothian	11,420	6,590
<b>SESplan</b>	<b>74,840</b>	<b>32,720</b>

**6.11** The delivery of the housing land requirement will, in all areas, be dependent on addressing infrastructure requirements as identified in Figure 2 Strategic Infrastructure in the approved SDP and in the associated Action Programme. LDPs will provide policy guidance for this in accord with Policy 9 (Infrastructure) of the approved SDP.

## 7 Delivery

### 7 Delivery

**7.1** Policy 5 of the approved SDP requires the preparation of Supplementary Guidance to provide detailed further information for LDPs as to how much of the total housing land requirement should be met in each of those six areas both in the period 2009 - 2019 and the period 2019 - 2024. To inform and steer the definition of housing land requirements in the Supplementary Guidance to the approved SDP, SESplan and the member authorities have:

1. Updated the Spatial Strategy Assessment underpinning the approved SDP and added an updated assessment of transport infrastructure, taking account of transport modelling of the proposals in the plan;
2. Updated information on the established land supply based on housing land audits for 2012;
3. Considered evidence on the behaviour of the housing market including advice from the development industry;
4. Completed an analysis of the opportunities and infrastructure and environmental capacity and constraints across the SESplan area which identified the scope for allowances in addition to those in the Proposed Plan; and
5. Defined requirements based on 1 - 4 above and guidance given by SPP and the aims and spatial strategy of the approved SDP.

**7.2** The requirements set out reflect the scale of the established land supply in each area, the conclusions of the analyses of opportunities and constraints, the behaviour of the housing market area and the anticipated deliverability of housing across the area. The requirements seek to ensure that need and demand is met where it arises subject to infrastructure and environmental constraints and other strategic planning considerations.

### Delivery

**7.3** Maintaining a supply of effective land for at least 5 years at all times, in accord with approved SDP Policy 6 and Policy 7, should ensure that there is a continuing generous supply of land for house building. Member authorities will base their calculation of the five year land supply on the period 2009 - 2024, taking into consideration housing completions. SESplan, in conjunction with member authorities, will monitor the supply of housing land on an annual basis in order to assess progress against the overall housing land requirement set out in Table 3.1. This will inform the preparation of member authority LDPs and the second SDP.

**7.4** A very significant increase in the rate of house completions across the SESplan area will be needed if the requirements set by this Supplementary Guidance are to be met. This is challenging and particularly so in 2009 - 2019 as it is expected that LDPs will be adopted around 2015, six years into the first period (2009 - 2019).

**7.5** Significant transport and strategic infrastructure improvements are essential to support the delivery of the housing land requirement set out in this Supplementary Guidance. These infrastructure requirements are set out in Figure 2 of the SDP and the accompanying Action Programme. In particular, school extensions and new schools to provide the additional pupil places required to meet development need are seen as essential and must be delivered

## Delivery 7

alongside development. LDPs will provide further details on these requirements in their Action Programmes and further policy guidance in accord with Policy 9 (Infrastructure) of the approved SDP.

**7.6** The Supplementary Guidance sets out a housing land requirement to meet need and demand from the South East Scotland region. Delivering that level of housing will be challenging and that will be made even more difficult should funding solutions to enable the provision of essential infrastructure improvements not be identified. A very significant increase in housing completion rates will also be required to deliver the housing needed to meet the need and demand which has been identified. Setting requirements for housing land at levels to meet the HNDAs estimates of need and demand for housing units in the South East Scotland region will ensure that the supply of housing land identified in development plans will not be the reason for failing to meet this challenge.

## 8 Appendices

### 8 Appendices

#### Appendix A - The Updated Spatial Strategy Assessment

Table 8.1

<b>Criteria</b>	<b>Accessibility</b>
<b>Summary of Methodology</b>	<p>The assessment is based on work undertaken by MVA to assess potential development locations in terms of regional and local accessibility indicators using Accession Modelling. It provided a consistent basis to compare the relative accessibility of locations across the SESplan area.</p> <p>The regional indicators were accessibility to employment, hospital facilities and retail parks and the local indicators were accessibility to GPs, secondary schools and local retail facilities. The accessibility assessments are based on shortest journey times accounting for both public transport routes and road speeds. The regional accessibility indicators are of most relevance in identifying suitable locations for strategic growth.</p> <p>The Stage 1 Accessibility Assessment (PTAL) demonstrated that the built up area of the City of Edinburgh has the best access to public transport services in the SEStran area. The Stage 2 methodology is aimed at measuring the relative accessibility of the outlying parts of the City and the wider region. Strategic Assessment Areas 12, 14 -17 (i.e. those lying within the built up area) have therefore been excluded from the Stage 2 Accessibility Assessment. Based on the outcomes of the Stage 1 Assessment, it can be assumed that these areas have good accessibility.</p> <p>Selected settlements within each of the remaining 25 areas were assessed in terms of the 3 regional indicators using a “Hansen” measure for employment and minimum journey time for others. An average figure was calculated for each area and the scores for each indicator were ranked. For the purposes of this assessment, greatest weight was given to the employment indicator in recognition that travel to and from work generates more journeys in the peak periods than the other two indicators and although the number of shopping trips exceeds travel to work, the travel to work is generally over longer distances.</p>

## Appendices 8

The regional accessibility indicators are less relevant in the Scottish Borders given its dispersed settlements and rural character. Because all of the Borders areas scored less well in terms of these 3 regional accessibility indicators, the local indicators were also taken into account in the assessment of areas 25 -30.			
Strategic Assessment Area	Member Authority	Assessment	Update
1. Fife West	FC	This area was ranked 13 <sup>th</sup> in terms of the employment accessibility indicator. It had similar rankings for hospital (12 <sup>th</sup> ) and retail (9 <sup>th</sup> )	No change.
2. Dunfermline Area	FC	This area is the most accessible in Fife, and ranked 6 <sup>th</sup> for employment accessibility, 3 <sup>rd</sup> for hospital and 6 <sup>th</sup> for retail.	No change.
3. Glenrothes / Kirkcaldy Area	FC	This area is ranked 14 <sup>th</sup> in terms of the employment accessibility indicator but has better accessibility to hospital (4 <sup>th</sup> ) and retail facilities (5 <sup>th</sup> ).	No change.
4. Fife South	FC	This area is the second most accessible location in Fife and ranked 10 <sup>th</sup> in terms of the employment accessibility indicator. It scored well in terms of accessibility to hospital facilities (6 <sup>th</sup> ) but only average for retail (14 <sup>th</sup> )	No change.
5. Fife East	FC	This area is the least accessible in Fife ranked 19 <sup>th</sup> (employment), and 18 <sup>th</sup> (both hospital and retail)	No change.
6. M9 Corridor	WLC	This area is the most accessible in West Lothian in terms of the employment indicator (ranked 3 <sup>rd</sup> ). However accessibility to hospital (11 <sup>th</sup> ) and retail (12 <sup>th</sup> ) facilities is not quite as good.	No change.
7. west West Lothian	WLC	This area has a good level of accessibility, ranked 8 <sup>th</sup> for employment and hospital facilities and 3 <sup>rd</sup> for retail.	No change.

## 8 Appendices

8. M8 Corridor	WLC	This area has very good accessibility to hospital (2 <sup>nd</sup> ) and retail (4 <sup>th</sup> ) facilities and good employment accessibility (7 <sup>th</sup> ).	No change.
9. North West Edinburgh	CEC	This area is ranked 2 <sup>nd</sup> in terms of the employment indicator and also has good accessibility to hospital (7 <sup>th</sup> ) and retail (7 <sup>th</sup> ) facilities.	No change.
10. West Edinburgh	CEC	West Edinburgh is the most accessible location in terms of the employment indicator and is ranked 2 <sup>nd</sup> for accessibility to retail facilities. Accessibility to hospital facilities is not quite as good (9 <sup>th</sup> ).	No change.
11. South West Edinburgh	CEC	South West Edinburgh is ranked 5 <sup>th</sup> in terms of the employment indicator which is the lowest of the Edinburgh locations. Accessibility to hospital (14 <sup>th</sup> ) and retail (13 <sup>th</sup> ) is only average across the SESplan area and poor compared to other Edinburgh locations.	No change.
12. South Edinburgh	CEC	Not included in Stage 2 Accessibility Assessment. Good accessibility assumed based on Stage 1 Accessibility Assessment (see explanation above).	No change.
13. South East Edinburgh	CEC / MC / ELC	This area is ranked 4 <sup>th</sup> in terms of the employment indicator and 1 <sup>st</sup> for accessibility to both hospital and retail facilities.	No change.
14. Central Edinburgh	CEC	Not included in Stage 2 Accessibility Assessment. Good accessibility assumed based on stage 1 Accessibility Assessment (see explanation above).	No change.
15. North East Edinburgh	CEC	Not included in Stage 2 Accessibility Assessment. Good accessibility assumed based on stage 1 Accessibility Assessment (see explanation above).	No change.

## Appendices 8

16. Edinburgh Waterfront	CEC	Not included in Stage 2 Accessibility Assessment. Good accessibility assumed based on stage 1 Accessibility Assessment (see explanation above).	No change.
17. North Edinburgh	CEC	Not included in Stage 2 Accessibility Assessment. Good accessibility assumed based on stage 1 Accessibility Assessment (see explanation above).	No change.
18. A7 / A68 / Borders Rail Corridor	MC	This area is ranked 11 <sup>th</sup> in terms of the employment and retail indicators and 5 <sup>th</sup> for accessibility to hospital facilities.	No change.
19. A701 Corridor	MC	This area is ranked 12 <sup>th</sup> in terms of the employment indicator and 10 <sup>th</sup> for accessibility to retail facilities. Accessibility to hospital facilities is not as good (17 <sup>th</sup> ).	No change.
20. Rural South Lothian Area	MC / ELC	This area has below average accessibility to employment (17 <sup>th</sup> ), hospital facilities (20 <sup>th</sup> ) and retail facilities (15 <sup>th</sup> ).	No change.
21. East Lothian West	ELC	This area is the most accessible part of East Lothian ranked 9 <sup>th</sup> in terms of the employment indicator, 13 <sup>th</sup> for accessibility to hospital facilities and 8 <sup>th</sup> for retail.	No Change.
22. East Lothian Central	ELC	This area is ranked 16 <sup>th</sup> in terms of accessibility to employment. Accessibility to hospital (23 <sup>rd</sup> ) and retail (20 <sup>th</sup> ) is not as good.	No Change.
23. East Lothian Coastal	ELC	This area is the least accessible part of East Lothian ranked 18 <sup>th</sup> overall for accessibility to employment, 25 <sup>th</sup> for hospital facilities and 21 <sup>st</sup> for retail.	No Change.
24. East Lothian East	ELC	This area is ranked 15 <sup>th</sup> in terms of accessibility to employment. Accessibility to hospital (19 <sup>th</sup> ) and retail (22 <sup>nd</sup> ) is not as good.	No Change.



## 8 Appendices

25. Eastern Borders	SBC	This area scored less well in terms of the employment (24 <sup>th</sup> ) and retail (24 <sup>th</sup> ) indicators. But better accessibility to hospital facilities (15 <sup>th</sup> ) and in terms of the local accessibility indicators, Eastern Borders scored highest of the whole SESplan area. Acts as a sub-regional area	No change.
26. Lauder / Coldstream Area	SBC	This area scored less in terms of the employment (23 <sup>rd</sup> ) and retail (23 <sup>rd</sup> ) indicators. But better accessibility to hospital facilities (16 <sup>th</sup> ) and good northern links to Edinburgh area. In terms of the local accessibility indicators, this area has the 2 <sup>nd</sup> lowest score overall.	No change.
27. Central Borders	SBC	In regional terms, the area is ranked 22 <sup>nd</sup> in terms of accessibility to employment, 20 <sup>th</sup> for accessibility to hospital facilities and 16 <sup>th</sup> for retail. One of the most accessible areas in terms of local services and facilities in the Scottish Borders (5 <sup>th</sup> overall).	No change.
28. South Borders	SBC	As expected given its remote, rural nature, this area is the least accessible in terms of both the regional and local accessibility indicators. (25 <sup>th</sup> for employment, retail and local and 24 <sup>th</sup> for hospital)	No change.
29. Western Borders	SBC	In terms of regional accessibility, this area is one of the best in the Borders – employment (21 <sup>st</sup> ), hospital (21 <sup>st</sup> ) and retail (17 <sup>th</sup> ). It has good links to Edinburgh area and acts as a sub-regional area for local services and facilities. It is ranked 22 <sup>nd</sup> in terms of the local accessibility indicator.	No change.
30. West Linton Area	SBC	In terms of the regional employment indicator, this is the most accessible part of the Scottish Borders (20 <sup>th</sup> ). This is probably explained by its proximity to Edinburgh. It is	No change.

	ranked 22 <sup>nd</sup> in terms of accessibility to hospital facilities and 19 <sup>th</sup> for retail. This area is ranked 23 <sup>rd</sup> for the local accessibility indicator.	
--	---	--

**Table 8.2**

<b>Infrastructure Capacity</b>	
<b>Criteria</b>	<b>Update</b>
<p><b>Summary of Methodology</b></p> <p>For the original assessment information for each strategic assessment area was gathered on - water supply / storage, drainage, transport and secondary schools. This information was sourced from SEStran, Transport Scotland, Scottish Water and the six Member Authorities. The information gathered on transport both in the original assessment and in the update has been extracted and is provided separately below. New development on a strategic scale will need significant infrastructure provision. The information in this table helps identify in which locations there are wider infrastructure issues to be overcome.</p>	<p><b>Update</b></p> <p><u>Water and Drainage</u> – No change, unless indicated by Scottish Water.</p> <p><u>Secondary Schools</u> - Likely to require additional capacity to accommodate existing commitments. A review of the school estate is ongoing.</p>
<b>Strategic Assessment Area</b>	<b>Assessment</b>
<p>1. Fife West</p>	<p><u>Water and Drainage</u> – There are currently no existing capacity issues in this area. Future investment will be necessary to provide additional strategic capacity in coming investment periods in order to retain flexibility and contingency within Fife.</p> <p>Infrastructure part 2 and 3 elements may require upgrades (paid for by developers) dependant on the specifics associated with actual sites identified for development. The WWTWs at Kincardine, Valleyfield and Saline have capacity available for incidental growth within the area only.</p> <p><u>Secondary Schools</u> - Require expansion to accommodate commitments.</p>

8 Appendices

<p>2. Dunfermline Area</p>	<p>FC</p>	<p><u>Water and Drainage</u> – There are currently no existing capacity issues in this area. Future investment will be necessary to provide additional strategic capacity in coming investment periods in order to retain flexibility and contingency within Fife. Infrastructure part 2 and 3 elements may require upgrades (paid for by developers) dependant on the specifics associated with actual sites identified for development. There is capacity available at both Ironmill Bay and Dunfermline WWTW to accommodate the growth horizon up to 2032 assuming a fairly even distribution of growth between the catchments.</p> <p><u>Secondary School</u> - New school may be required to accommodate commitments and could provide additional capacity.</p>	<p><u>Water and Drainage</u> – no change, unless indicated by Scottish Water.</p> <p><u>Secondary Schools</u> - Likely to require additional capacity to accommodate existing commitments and this could provide additional capacity. A review of the school estate is ongoing.</p>
<p>3. Glenrothes / Kirkcaldy Area</p>	<p>FC</p>	<p><u>Water and Drainage</u> – There are currently no existing capacity issues in this area. Future investment will be necessary to provide additional strategic capacity in coming investment periods in order to retain flexibility and contingency within Fife. Infrastructure part 2 and 3 elements may require upgrades (paid for by developers) dependent on the specifics associated with actual sites identified for development. Scottish Water will respond to the need for additional investment as and when development comes forward by monitoring available capacity. Scottish Water, local authorities and developers will be required to work together to ensure that appropriate investment is provided as required. In addition, local network mitigation measures remain the developers’ responsibility. The majority of this area (Kelty, Cowdenbeath, Cardenden, Lochgelly, Glenrothes etc) drains to Levenmouth PFI asset. Current PFI contracts ensure that these works will provide capacity to a defined population equivalent (PE). Once these limits are reached, responsibility</p>	<p><u>Water and Drainage</u> – No change, unless indicated by Scottish Water.</p> <p><u>Secondary Schools</u> - Proposed replacement schools at Kirkcaldy East and Glenrothes will not increase capacity. Capacity is currently available in Glenrothes. A review of the school estate is ongoing.</p>

<p>4. Fife South</p>	<p>FC</p>	<p>for providing capacity will rest with Scottish Water. Kirkcaldy WWTW is a Scottish Water asset and dependent on where the proposed development occurs, it may need to be upgraded. Anticipated growth in period up to 2024 should be accommodated relatively easily. However significant investment will be required for major development post 2024.</p> <p><u>Secondary Schools</u> - Proposed replacement schools at Kirkcaldy East (little spare capacity will be available) and Glenrothes (capacity will be available post 2026). Likely capacity issues at Cowdenbeath.</p>	
		<p><u>Water and Drainage</u> – There are currently no existing capacity issues in this area. Future investment will be necessary to provide additional strategic capacity in coming investment periods in order to retain flexibility and contingency within Fife. Infrastructure part 2 and 3 elements may require upgrades (paid for by developers) dependent on the specifics associated with actual sites identified for development. Scottish Water will respond to the need for additional investment as and when development comes forward by monitoring available capacity. Scottish Water, local authorities and developers will be required to work together to ensure that appropriate investment is provided as required. In addition, local network mitigation measures remain the developers' responsibility. Some drainage issues including flooding exist at Burntisland. Dependant on where new development is proposed, Aberdeen and Kinghorn WWTW may need to be upgraded.</p> <p><u>Secondary Schools</u> - Require expansion to accommodate existing commitments.</p>	<p><u>Water and Drainage</u> – No change, unless indicated by Scottish Water.</p> <p><u>Secondary Schools</u> - Likely to require additional capacity to accommodate existing commitments. A review of the school estate is ongoing.</p>

8 Appendices

<p>5. Fife East</p>	<p>FC</p>	<p><u>Water and Drainage</u> – There are currently no existing capacity issues in this area. Future investment will be necessary to provide additional strategic capacity in coming investment periods in order to retain flexibility and contingency within Fife. Infrastructure part 2 and 3 elements may require upgrades (paid for by developers) dependent on the specifics associated with actual sites identified for development. Scottish Water will respond to the need for additional investment as and when development comes forward by monitoring available capacity. Scottish Water, Local Authorities and developers will be required to work together to ensure that appropriate investment is provided as required. In addition, local network mitigation measures remain the developers' responsibility. The majority of this area (Leven, Methil and Buckhaven) drains to Levenmouth PFI. The current PFI contracts ensure that these works will provide capacity to a defined PE. Once these limits are reached, responsibility for providing capacity will rest with Scottish Water. East Wemyss WWTW is a Scottish Water asset and dependant on where development is proposed may need upgraded.</p> <p><u>Secondary Schools</u> - Require expansion to accommodate commitments.</p>	<p><u>Water and Drainage</u> – No change, unless indicated by Scottish Water.</p> <p><u>Secondary Schools</u> - Proposed replacement schools at Madras and Levenmouth to provide capacity to accommodate existing commitments. A review of the school estate is ongoing.</p>
<p>6. M9 Corridor</p>	<p>WLC</p>	<p><u>Water and Drainage</u> – There is currently sufficient supply at the WTWs serving West Lothian to support development. As and when development comes forward (either that already allocated or future allocations), Scottish Water will provide strategic capacity to support new development. Local network improvements, including any modelling work which may be required to identify improvements, as well as site-based infrastructure remains the responsibility of developers to provide. As with many treatment works serving catchments where large</p>	<p><u>Water and Drainage</u> - West Lothian is served by three WTWs – Balmore, Marchbank and Pateshill where capacity is available. These are supported by waste water treatment works across the area where in general capacity is also available. There are capacity issues however, at Blackburn, East</p>

<p>Calder, Fauldhouse, Livingston, Newbridge and the Whitburn WWTWs. Scottish Water advise, however, that concerns regarding capacity should not prevent a site being excluded in the emerging development plan for development as they will work with interested parties to find a solution. Scottish Water's expectation for the Livingston WWTW is that developers / end-users will fund any expansion of the works. The River Almond Catchment Study will inform improvements required here. The East Calder WWTW also forms part of the River Almond Catchment Study and is operated and maintained by Scottish Water. Only if the River Almond Catchment Study indicates that the WWTW requires upgrading for water quality improvements will there be a need for further investment at the East Calder plant.</p>	<p>-</p> <p><u>Secondary Schools - Constraint</u> applies until new secondary schools are built at Winchburgh.</p>
<p>scale strategic housing development is allocated, investment will be required to ensure that appropriate capacity solutions can be found to support development in the longer term. Local network mitigation measures remain the responsibility of developers to provide. As and when firm proposals / start dates / build programmes are provided and local mitigation measures agreed, Scottish Water will be able to commence work to ensure that appropriate investment is delivered to support proposals in the longer-term. Capacity cannot be created ahead of development coming forward and close dialogue between all parties is essential to ensure that the right investment is delivered at the right time. For those PFI operated treatment works serving West Lothian, the current PFI contracts ensure that these will provide capacity to define PEs or other such qualifying criteria depending on the PFI contract. Once these limits are reached responsibility for providing capacity generally rests with Scottish Water. Scottish Water will continue to monitor growth levels to ensure that over the longer-term sufficient capacity is provided to meet growth requirements either through PFI contracts or Scottish Water.</p> <p><u>Secondary Schools</u> - Require expansion to accommodate commitments (but no spare capacity for further development). Some limited capacity at Broxburn.</p>	

8 Appendices

<p>7. west West Lothian</p>	<p>WLC</p>	<p><u>Water and Drainage</u> – There is currently sufficient supply at the WTWs serving West Lothian to support development. As and when development comes forward (either that already allocated or future allocations), Scottish Water will provide strategic capacity to support new development. Local network improvements, including any modelling work which may be required to identify improvements and site-based infrastructure, remains the responsibility of developers to provide. Existing capacity is available at a number of treatment works. Scottish Water will monitor the situation to ensure that sufficient capacity is provided at treatment works to support new development as it emerges. For those PFI operated treatment works serving West Lothian, capacity will be provided to support new development up to prescribed contractual limits. Beyond this responsibility will revert to Scottish Water.</p> <p><u>Secondary Schools</u> – No capacity. Possible scope for expansion but would provide limited new capacity.</p>	<p><u>Water and Drainage - West Lothian</u> is served by three WTWs – Balmore, Marchbank and Pateshill where capacity is available. These are supported by WWTWs across the area where in general capacity is also available. There are capacity issues however, at Blackburn, East Calder, Fauldhouse, Livingston, Newbridge and the Whitburn WWTW. Scottish Water advise, however, that concerns regarding capacity should not prevent a site being excluded in the emerging development plan for development as they will work with interested parties to find a solution. Scottish Water’s expectation for the Livingston WWTW is that developers / end-users will fund any expansion of the works. The River Almond Catchment Study will inform improvements required here. The East Calder WWTW also forms part of the River Almond Catchment Study and is operated and maintained by Scottish Water. Only if the River Almond Catchment Study indicates that the WWTW requires upgrading for water quality</p>
-----------------------------	------------	--	---

<p>8. M8 Corridor</p>	<p>WLC</p>	<p><u>Water and Drainage</u> – There is currently sufficient supply at the WTWs serving West Lothian to support development. As and when development comes forward (either that already allocated or future allocations), Scottish Water will provide strategic capacity to support new development. Local network improvements, including any modelling work which may be required to identify improvements and site-based infrastructure, remains the responsibility of developers to provide. Scottish Water will respond to the need for additional investment as and when development comes forward. There is no uncertainty around investment for additional development - instead investment can only be delivered in response to emerging needs as and when these can be identified as progressing into build. Scottish Water does not provide investment ahead of development and instead monitor capacity issues to ensure that it can respond in a timely fashion as and when required. It is critical that Scottish Water, local authorities and developers work together to ensure that investment is provided as and when</p>	<p>improvements will there be a need for further investment at the East Calder plant.</p> <p><u>Secondary Schools - Constraint</u> applies until a new denominational secondary school is built at Winchburgh. Capacity constraints at Armadale, Bathgate and Whitburn Academies. Catchment reviews and school extensions could be undertaken to provide additional capacity.</p>
			<p><u>Water and Drainage - West Lothian</u> is served by three WTWs - Balmore, Marchbank and Pateshill where capacity is available. These are supported by waste water treatment works across the area where in general capacity is also available. There are capacity issues however, at Blackburn, East Calder, Fauldhouse, Livingston, Newbridge and the Whitburn WWTs. Scottish Water advise, however, that concerns regarding capacity should not prevent a site being excluded in the emerging development plan for development as they will work with interested parties to find a solution. Scottish</p>



## 8 Appendices

<p>9. North West Edinburgh</p>	<p>CEC</p>	<p>required. Only commercial development may be required to contribute towards creating capacity to support new development - Scottish Water will provide capacity to support residential development. <u>Secondary Schools</u> - Review may allow some capacity.</p>	<p>Water's expectation for the Livingston WWTW is that developers / end-users will fund any expansion of the works. The River Almond Catchment Study will inform improvements required here. The East Calder WWTW also forms part of the River Almond Catchment Study and is operated and maintained by Scottish Water. Only if the River Almond Catchment Study indicates that the WWTW requires upgrading for water quality improvements will there be a need for further investment at the East Calder plant. <u>Secondary Schools</u> - Some capacity available. New secondary schools at Winchburgh and East Calder (Calderwood) and extensions to high schools in Livingston and West Calder and catchment reviews could create further capacity.</p>
		<p><u>Water and Drainage</u> – Water supply is from existing Marchbank WTW. As and when development comes forward (either that already allocated or future allocations), Scottish Water will provide strategic capacity to support new development. Local network and site-based infrastructure remains the responsibility of the developer to provide.</p>	<p>No change.</p>

		<p>The current PFI contracts ensure that these treatment works will provide capacity to defined population equivalents or other such qualifying criteria depending on the contract. Once these limits are reached, responsibility for providing capacity generally rests with Scottish Water. Scottish Water will continue to monitor growth levels to ensure that over the longer-term sufficient capacity is provided to meet growth requirements either through PFI contracts or Scottish Water.</p> <p><u>Transport</u> – Increased delays on the M9 spur and through Kirkliston. Barton junction is a significant capacity constraint. Capacity issues in and around West Edinburgh have implications for this area. Implications of the Forth Replacement Crossing and its associated links need to be considered.</p> <p><u>Secondary Schools</u> – denominational catchment re-alignment underway; capacity available for committed developments in both denominational and non-denominational Secondary Schools; extensions will be required for further developments.</p>	
<p>10. West Edinburgh</p>	<p>CEC</p>	<p>Significant new/improved infrastructure required but much of this should be delivered through implementation of existing proposals.</p> <p><u>Water and Drainage</u> – There is sufficient capacity at the WTW serving this area. On-going work is being undertaken to assess the requirements for water/waste water provision in the West Edinburgh area. This will ensure that the extent of both developer-funded infrastructure and Scottish Water costs are known. The situation will be monitored and proposals worked-up over the mid to longer-term.</p>	<p>No change.</p>

## 8 Appendices

	<p>West Edinburgh is provided with water by both Marchbank and Balmore water treatment works. Water supply in this area will be monitored and operational plans developed in the longer term to ensure security of supply to existing customers and to meet demands from new growth as appropriate.</p> <p>No evidence of any likely delay in providing strategic capacity at Newbridge/Seafield treatment works whether funded by PFI or Scottish Water. The current PFI contracts ensure that these treatment works will provide capacity to defined population equivalents or other such qualifying criteria depending on the contract. Once these limits are reached, responsibility for providing capacity generally rests with Scottish Water. Scottish Water will continue to monitor growth levels to ensure that sufficient long term capacity is provided to meet growth requirements either through PFI contracts or Scottish Water.</p>	
	<p><u>Transport</u> – significant committed infrastructure e.g. tram, Gogar Station, Edinburgh – Glasgow (Rail) Improvement Programme (EGIP). West Edinburgh Transport Appraisal identified further necessary interventions associated with development at the airport, Royal Highland Centre and International Business Gateway. These should be delivered through the West Edinburgh Development Partnership.</p>	
	<p>Capacity at Newbridge junction is a significant constraint on the strategic network which will need to be addressed by development in West Edinburgh, West Lothian and potentially Fife. Increased delays on the A8, Gogar and Edinburgh Park area.</p>	

<p>11. South West Edinburgh</p>	<p>CEC</p>	<p><u>Secondary School</u> – Craigmount HS has limited spare capacity. Limited scope to expand on site. Catchment review would be required which could deliver capacity.</p>	<p>No change.</p>
		<p><u>Water and Drainage</u> – As and when development comes forward (either that already allocated or future allocations), Scottish Water will provide strategic capacity to support new development. Local network and site-based infrastructure remains the responsibility of the developer to provide. There is currently no evidence of any likely delay in providing treatment capacity to support new development. The current PFI contracts ensure that these treatment works will provide capacity to defined population equivalents or other such qualifying criteria depending on the contract. Once these limits are reached, responsibility for providing capacity generally rests with Scottish Water. Scottish Water will continue to monitor growth levels to ensure that sufficient long term capacity is provided to meet growth requirements either through PFI contracts or Scottish Water.</p> <p><u>Transport</u> – Increase to number of local services to Currie Station not supported by Transport Scotland because of impact on Glasgow-Edinburgh journey times. Once EGIP is delivered it would be for local interests to develop the case for further enhancements, demonstrating how these can be integrated into the national network. Proposal to upgrade Hermiston P&amp;R. Increase in delays along the A70 and A71 approaches to Edinburgh. Growth in congestion around Hermiston Gait and the Calder junction.</p> <p><u>Secondary School</u> – Currie &amp; Balerno High Schools have limited spare capacity; scope to expand on site.</p>	

8 Appendices

<p>12. South Edinburgh</p>	<p>CEC</p>	<p><u>Water and Drainage</u> – As and when development comes forward (either that already allocated or future allocations), Scottish Water will provide strategic capacity to support new development. Local network and site-based infrastructure remains the responsibility of the developer to provide.</p> <p>There is currently no evidence of any likely delay in providing treatment capacity to support new development. The current PFI contracts ensure that these treatment works will provide capacity to defined population equivalents or other such qualifying criteria depending on the contract. Once these limits are reached, responsibility for providing capacity generally rests with Scottish Water. Scottish Water will continue to monitor growth levels to ensure that sufficient long term capacity is provided to meet growth requirements either through PFI contracts or Scottish Water.</p> <p><u>Transport</u> – The A720 (city bypass) already operating at or near capacity at peak hours. Increased delays forecast on A720 and associated junctions.</p> <p><u>Secondary School</u> – All at capacity with limited scope for expansion on site.</p>	<p>No change.</p>
<p>13. South East Edinburgh</p>	<p>CEC / MC / ELC</p>	<p><u>Water and Drainage</u> – As and when development comes forward (either that already allocated or future allocations), Scottish Water will provide strategic capacity to support new development. Local network and site-based infrastructure remains the responsibility of the developer to provide. There is currently no evidence of any likely delay in providing treatment capacity to support new development. The current PFI contracts ensure</p>	<p><u>Water and Drainage</u> – No change.</p> <p><u>Secondary School</u> - MLDP MIR seeking views on a new secondary school to serve Shawfair (and potentially parts of East Lothian), rather than extend Dalkeith High</p>

Appendices 8

		<p>that these treatment works will provide capacity to defined population equivalents or other such qualifying criteria depending on the contract. Once these limits are reached, responsibility for providing capacity generally rests with Scottish Water. Scottish Water will continue to monitor growth levels to ensure that sufficient long term capacity is provided to meet growth requirements either through PFI contracts or Scottish Water.</p> <p><u>Secondary School</u> – Extension required at Dalkeith High School to accommodate Shawfair committed development but no capacity for additional development. Review of Midlothian Secondary School provision underway. Liberton and Gracemount High Schools have limited spare capacity. Both may have some scope for expansion on site. Castlebrae High School has spare capacity.</p>	<p>School. No funding available for either option and complex issues to deliver new secondary school.</p>
<p>14. Central Edinburgh</p>	<p>CEC</p>	<p><u>Water and Drainage</u> – Central Edinburgh will be provided with water by the new Glencorse Water treatment works. At this moment in time there is more than adequate capacity to support development in the longer-term. As and when development comes forward (either that already allocated or future allocations), Scottish Water will provide strategic capacity to support new development. Local network and site-based infrastructure remains the responsibility of the developer to provide.</p> <p>There is currently no evidence of any likely delay in providing treatment capacity to support new development. The current PFI contracts ensure that these treatment works will provide capacity to defined population equivalents or other such qualifying criteria depending on the contract. Once these limits are reached, responsibility for providing capacity generally rests with Scottish Water. Scottish Water will continue to monitor</p>	<p>No change.</p>

8 Appendices

<p>15. North East Edinburgh</p>	<p>CEC</p>	<p>growth levels to ensure that sufficient long term capacity is provided to meet growth requirements either through PFI contracts or Scottish Water.</p> <p><u>Transport</u> – Area at the heart of the regional public transport network and well served by existing rail and bus services. Proposed tram will provide further improvements.</p> <p><u>Secondary School</u> – James Gillespie’s (to be rebuilt), Borroughmuir, Drummond &amp; Broughton High Schools all at capacity with limited scope for expansion on site.</p>	
		<p><u>Water and Drainage</u> – As and when development comes forward (either that already allocated or future allocations), Scottish Water will provide strategic capacity to support new development. Local network and site-based infrastructure remains the responsibility of the developer to provide.</p> <p>There is currently no evidence of any likely delay in providing treatment capacity to support new development. The current PFI contracts ensure that these treatment works will provide capacity to defined population equivalents or other such qualifying criteria depending on the contract. Once these limits are reached, responsibility for providing capacity generally rests with Scottish Water. Scottish Water will continue to monitor growth levels to ensure that sufficient long term capacity is provided to meet growth requirements either through PFI contracts or Scottish Water.</p> <p><u>Transport</u> - significant transport infrastructure required as identified in the North East Transport Action Plan.</p>	<p>No change.</p>

<p>16. Edinburgh Waterfront</p>	<p>CEC</p>	<p><u>Secondary School</u> – Portobello High School to be rebuilt, but at current capacity; limited scope for growth.</p>	<p><u>Water and Drainage</u> – Significant recent investment has been undertaken to provide water supply to enable long-term development proposals for the Waterfront area. As and when other development comes forward (either that already allocated or future allocations), Scottish Water will provide strategic capacity to support new development. Local network and site-based infrastructure remains the responsibility of the developer to provide.</p> <p>There is currently no evidence of any likely delay in providing treatment capacity to support new development. The current PFI contracts ensure that these treatment works will provide capacity to defined population equivalents or other such qualifying criteria depending on the contract. Once these limits are reached, responsibility for providing capacity generally rests with Scottish Water. Scottish Water will continue to monitor growth levels to ensure that sufficient long term capacity is provided to meet growth requirements either through PFI contracts or Scottish Water.</p> <p><u>Transport</u> – significant transport infrastructure required as identified in the North East Transport Action Plan.</p> <p>Tax Incremental Finance (TIF) approach to be used to fund infrastructure delivery.</p>	<p>No change.</p>
---------------------------------	------------	---	--	-------------------



## 8 Appendices

<p>17. North Edinburgh</p>	<p>CEC</p>	<p><u>Secondary School</u> – Phase 1 will use existing Secondary School capacity; new Secondary School for Leith docks proposed for further phases. Leith &amp; Trinity High Schools have limited spare capacity and limited potential to expand.</p>	<p>No change.</p>
		<p><u>Water and Drainage</u> – As and when development comes forward (either that already allocated or future allocations), Scottish Water will provide strategic capacity to support new development. Local network and site-based infrastructure remains the responsibility of the developer to provide.</p> <p>There is currently no evidence of any likely delay in providing treatment capacity to support new development. The current PFI contracts ensure that these treatment works will provide capacity to defined population equivalents or other such qualifying criteria depending on the contract. Once these limits are reached, responsibility for providing capacity generally rests with Scottish Water. Scottish Water will continue to monitor growth levels to ensure that sufficient long term capacity is provided to meet growth requirements either through PFI contracts or Scottish Water.</p> <p><u>Transport</u> - Junction delays at Maybury, Barnton, Quality St, Blackhall and Gyle. Development proposals at West Edinburgh may exacerbate these delays.</p> <p><u>Secondary School</u> - Craigmount High School has limited spare capacity. Has limited scope to expand on site; Catchment review would be required to deliver capacity; Craigmount High School limited spare capacity.</p>	

<p>18. A7 / A68 / Borders Rail Corridor</p>	<p>MC</p>	<p><u>Water and Drainage</u> – Capacity currently exists at the relevant WTW to support development allocated in Local Plans. In the longer-term, available capacity will be monitored and any necessary strategic capacity that may be required will be provided by Scottish Water. Local network and site-based infrastructure remains the responsibility of the developer to provide. There is currently no evidence of any likely delay in providing treatment capacity to support new development. The current PFI contracts ensure that these treatment works will provide capacity to defined PEs or other such qualifying criteria depending on the contract. Once these limits are reached, responsibility for providing capacity generally rests with Scottish Water. Scottish Water will continue to monitor growth levels to ensure that sufficient long term capacity is provided to meet growth requirements either through PFI contracts or Scottish Water.</p> <p><u>Secondary Schools</u> – No Secondary School capacity available once committed development taken into account. Newbattle High School will require to be rebuilt / extended to meet commitments. No scope to extend further. Dalkeith High School to be extended to accommodate Shawfair; no scope to extend further.</p>	<p><u>Water and Drainage</u> – <u>No change.</u></p> <p><u>Secondary Schools</u> – If decision taken to build new secondary school at Shawfair (for which no funding has been identified), this will remove need to extend at Dalkeith High School, where site is constrained. Newbattle and Lasswade High Schools will, or have been replaced by new builds. MLDP MIR assumes both will need extension to meet MIR housing. No scope for further extensions.</p>
<p>19. A701 Corridor</p>	<p>MC</p>	<p><u>Water and Drainage</u> – Capacity currently exists at the relevant WTW to support development allocated in Local Plans. In the longer-term, available capacity will be monitored and any necessary strategic capacity that may be required will be provided by Scottish Water. Local network and site-based infrastructure remains the responsibility of the developer to provide. There is currently no evidence of any likely delay in providing treatment capacity to support new development. The</p>	<p><u>Water and Drainage</u> – <u>No change.</u></p> <p><u>Secondary Schools</u> – Any spare capacity will be utilised by MLDP MIR allocations in corridor. No additional capacity remaining.</p>

## 8 Appendices

		<p>current PFI contracts ensure that these treatment works will provide capacity to defined PEs or other such qualifying criteria depending on the contract. Once these limits are reached, responsibility for providing capacity generally rests with Scottish Water. Scottish Water will continue to monitor growth levels to ensure that sufficient long term capacity is provided to meet growth requirements either through PFI contracts or Scottish Water.</p> <p><u>Secondary Schools</u> – Some limited capacity at Penicuik (Penicuik and Beeslack High Schools). However some may be used in catchment rationalisation.</p>	
<p>20. Rural South Lothian Area</p>	<p>MC / ELC</p>	<p><u>Water and Drainage</u> – Capacity currently exists at the relevant WTW to support development allocated in Local Plans. In the longer-term available capacity will be monitored and any necessary strategic capacity that may be required will be provided by Scottish Water. Local network and site-based infrastructure remains the responsibility of the developer to provide.</p> <p>Some parts of this area drain to Seafield WTW which is a PFI asset. Other smaller settlements in the area have their own small treatment works or septic tanks.</p> <p><u>Transport</u>: road network unsuitable for significant growth; no planned public transport investment that will support this location. Modest deterioration on the A6093, no issues on the A68 in this area.</p> <p><u>Secondary Schools</u> – comments as Area 18 and 21/22 – no capacity beyond committed development.</p>	<p>No change.</p>

<p>21. East Lothian West</p>	<p>ELC</p>	<p><u>Water and Drainage</u> – Capacity currently exists at the relevant WTW to support development allocated in Local Plans. In the longer-term available capacity will be monitored and any necessary strategic capacity that may be required will be provided by Scottish Water. Local network and site-based infrastructure remains the responsibility of the developer to provide. There is currently no evidence of any likely delay in providing treatment capacity to support new development. The current PFI contracts ensure that these treatment works will provide capacity to defined population equivalents or other such qualifying criteria depending on the contract. Once these limits are reached, responsibility for providing capacity generally rests with Scottish Water. Scottish Water will continue to monitor growth levels to ensure that sufficient long term capacity is provided to meet growth requirements either through PFI contracts or Scottish Water.</p> <p>-</p> <p><u>Secondary Schools</u> – Musselburgh Grammar and Ross High (Tranent) will be at capacity (2017; 2020). Preston Lodge has capacity for committed development.</p>	<p><u>Water and Drainage</u> – No Change.</p> <p><u>Secondary schools</u> – Musselburgh Grammar has the potential to expand significantly beyond current commitments but this would require substantial demolition and rebuild. End state capacity unclear at moment. New primary school would be required in Musselburgh Grammar catchment to accommodate significant additional housing other than in Whitecraig. Preston Lodge Secondary may now have some significant spare capacity, over time beyond committed developments. Cockenzie Primary has scope for significant expansion, while Longniddry Primary has some modest capacity. Limited capacity at its upper infant school will limit the ability of Prestonpans Primary to accommodate significant further growth. Ross High Secondary has some modest potential to expand. Macmerry and Sanderson’s Wynd Primary have the greatest capacity for an expansion of primary capacity. Windygoul Primary has significant capacity issues that are likely to involve negotiations with</p>
------------------------------	------------	---	--

## 8 Appendices

<p>22. East Lothian Central</p>	<p>ELC</p>	<p><u>Water and Drainage</u> – Capacity currently exists at the relevant WTW to support development allocated in Local Plans. In the longer-term, available capacity will be monitored and any necessary strategic capacity that may be required will be provided by Scottish Water. Local network and site-based infrastructure remains the responsibility of the developer to provide. Capacity currently exists at the relevant WWTW to support development allocated in Local Plans. In the longer-term available capacity will be monitored and any necessary strategic capacity that may be required will be provided by Scottish Water. Some local network issues may require to be addressed and such issues remain the responsibility of the developer to address.</p> <p><u>Secondary School</u> – Knox Academy will be at capacity at 2018.</p>	<p>landowner / developer to address the existing situation and allow additional capacity. Elsewhere, capacity and expansion potential is very limited at Primary level.</p>
<p><u>Water and Drainage</u> – No Change.</p> <p><u>Secondary Schools</u> – Knox Academy has potential for a modest increase in capacity. Haddington Infant (lower) has a peak pupil roll within its current notional capacity and the potential to take one additional classroom. St Mary's RC peak projected roll is almost identical to its current notional capacity with no potential for expansion. Yester Primary could support some modest expansion.</p>	<p><u>Water and Drainage</u> – Capacity currently exists at the relevant WTW to support development allocated in Local Plans. In the longer-term available capacity will be monitored and any necessary strategic capacity that may be required will be provided by Scottish Water. Local network and site-based infrastructure remains the responsibility of the developer to provide. Capacity currently exists at the relevant WWTW to support development allocated in Local Plans. In the longer-term</p>	<p><u>Water and Drainage</u> – Little or no foul drainage capacity in North Berwick / Dirleton catchment.</p> <p><u>Secondary School</u> – North Berwick High School could accommodate a modest increase in capacity. Only Dirleton Primary's catchment seems</p>	<p><u>Water and Drainage</u> – Little or no foul drainage capacity in North Berwick / Dirleton catchment.</p> <p><u>Secondary School</u> – North Berwick High School could accommodate a modest increase in capacity. Only Dirleton Primary's catchment seems</p>

		<p>available capacity will be monitored and any necessary strategic capacity that may be required will be provided by Scottish Water. Some local network issues may require to be addressed and such issues remain the responsibility of the developer to address. Given particular issues at North Berwick, should large scale development be allocated in this area in the mid to long-term then a solution will need to be agreed between stakeholders to allow development to progress.</p> <p><u>Secondary School</u> – North Berwick High School will be at capacity at 2016.</p> <p>Overall, there are significant infrastructure constraints at North Berwick.</p>	<p>to be one to avoid. Aberlady, and more particularly, Gullane have significant potential spare capacity.</p>
<p>24. East Lothian East</p>	<p>ELC</p>	<p><u>Water and Drainage</u> – Capacity currently exists at the relevant WTW to support development allocated in Local Plans. In the longer-term available capacity will be monitored and any necessary strategic capacity that may be required will be provided by Scottish Water. Local network and site-based infrastructure remains the responsibility of the developer to provide. Capacity currently exists at the relevant WWTW to support development allocated in Local Plans. In the longer-term available capacity will be monitored and any necessary strategic capacity that may be required will be provided by Scottish Water. Some local network issues particularly around water storage may require to be addressed and such issues remain the responsibility of the developer to address. However, Scottish Water is currently considering potential solutions.</p> <p><u>Secondary School</u> – Dunbar Grammar at capacity at 2014.</p>	<p><u>Water and Drainage</u> – No Change.</p> <p><u>Secondary school</u> – Dunbar Grammar has the capacity for a modest expansion. Within this school cluster, only Stenton Primary cannot be expanded. A modest increase in capacity is possible in the other Primary School's here.</p>

∞ Appendices

<p>25. Eastern Borders</p>	<p>SBC</p>	<p><u>Water and Drainage</u> – Capacity currently exists at the relevant WTW to support development allocated in Local Plans. In the longer-term available capacity will be monitored and any necessary strategic capacity that may be required will be provided by Scottish Water. Local network and site-based infrastructure remains the responsibility of the developer to provide. There is generally available capacity at the larger treatment works serving this area but there may be limited capacity at some of the smaller works. Scottish Water’s normal investment rules will apply. If new development is allocated, Scottish Water will monitor the situation to ensure that appropriate capacity can be provided as and when such development comes forward to build.</p> <p>-</p> <p><u>Secondary Schools</u> – Some longer term capacity at Berwickshire and Eyemouth High Schools.</p>	<p><u>Water and Drainage</u> - No change.</p> <p><u>Secondary Schools</u> – No change.</p> <p><u>Primary Schools</u> – Reston Primary School has severe capacity issues and a suitable replacement site needs to be found.</p>
<p>26. Lauder / Coldstream Area</p>	<p>SBC</p>	<p><u>Water and Drainage</u> – There is treatment capacity to support new development. Any local network enhancements and site-based infrastructure remains the responsibility of the developer to provide. There is generally available capacity at the larger treatment works serving this area but there may be limited capacity at some of the smaller works. Scottish Water’s normal investment rules will apply. If new development is allocated, Scottish Water will monitor the situation to ensure that appropriate capacity can be provided as and when such development comes forward to build.</p> <p>-</p>	<p><u>Water and Drainage</u> – No change.</p> <p><u>Secondary School</u> – Remove “<i>but little beyond that</i>”.</p> <p>The Director of Education has advised that there is no schools capacity for further large-scale development in Lauder.</p>

<p>27. Central Borders</p>	<p>SBC</p>	<p><u>Secondary Schools</u> – Earlston High School has capacity for committed development, but little beyond that.</p> <p><u>Water and Drainage</u> – There is treatment capacity to support new development. Any local network enhancements and site-based infrastructure remains the responsibility of the developer to provide. There is generally available capacity at the larger treatment works serving this area but there may be limited capacity at some of the smaller works. Scottish Water’s normal investment rules will apply. If new development is allocated, Scottish Water will monitor the situation to ensure that appropriate capacity can be provided as and when such development comes forward to build.</p> <p>-</p> <p><u>Secondary Schools</u> – Hawick, Jedburgh, Kelso and Selkirk secondary schools have capacity. Earlston unlikely to have capacity longer term (after committed development). Galashiels has capacity for modest development.</p>	<p><u>Water and Drainage</u> – No change.</p> <p><u>Secondary Schools</u> – Earlston, Galashiels, Hawick, Jedburgh and Selkirk Secondary Schools have capacity. Kelso High School is unsuitable for future use and it has been agreed that a new school will be built, due to open in 2016.</p> <p><u>Primary Schools</u> – There are significant issues with Primary Schools in Galashiels. The Primary Schools in Newtown St Boswells and St Boswells as well as Philiphaugh and Knowepark in Selkirk, may have capacity issues depending on future capacity. There are also capacity issues at Broomlands Primary School in Kelso.</p>
<p>28. South Borders</p>	<p>SBC</p>	<p><u>Water and Drainage</u> – Currently there is no capacity at Bonchester WTW and limited capacity at Southdean WTW and Newcastleton WTW. Any local network enhancements and site-based infrastructure remains the responsibility of the developer to provide. There is generally available capacity at the larger treatment works serving this area but there may be</p>	<p><u>Water and Drainage</u> – Currently there is limited capacity at Bonchester WTW, Chesters WTW, Morebattle and Yetholm WTW. There is sufficient capacity at Newcastleton WTW to serve</p>



8 Appendices

<p>29. Western Borders</p>	<p>SBC</p>	<p>limited capacity at some of the smaller works. Scottish Water's normal investment rules will apply. If new development is allocated, Scottish Water will monitor the situation to ensure that appropriate capacity can be provided as and when such development comes forward to build.</p> <p><u>Secondary Schools</u> – Hawick and Jedburgh Secondary Schools have capacity.</p>	<p>existing allocations within the settlement. Any local network enhancements and site-based infrastructure remains the responsibility of the developer to provide. Scottish Water's normal investment rules will apply. If new development is allocated, Scottish Water will monitor the situation to ensure that appropriate capacity can be provided as and when such development comes forward to build.</p> <p><u>Secondary School</u> – Hawick, Jedburgh and Selkirk Secondary Schools have capacity. Kelso High School is unsuitable for future use and it has been agreed that a new school will be built, due to open in 2016.</p> <p><u>Primary Schools</u> – The Primary School at Sprouston may have capacity issues depending on future development.</p>
		<p><u>Water and Drainage</u> – There is treatment capacity to support the development identified in the Local Plan, however any additional development would require the WTW to be upgraded. Any local network enhancements and site-based infrastructure</p>	<p><u>Water and Drainage</u> – No change.</p> <p><u>Secondary Schools</u> – No change.</p>

		<p>remains the responsibility of the developer to provide. There is generally available capacity at the larger treatment works serving this area but there may be limited capacity at some of the smaller works. Scottish Water's normal investment rules will apply. If new development is allocated, Scottish Water will monitor the situation to ensure that appropriate capacity can be provided as and when such development comes forward to build.</p> <p>-</p> <p><u>Secondary Schools</u> – Peebles High School has capacity for committed development. There may be very limited additional capacity.</p>	<p><u>Primary Schools</u> - If development continues and school capacities are pressured further, a new Primary School south of River Tweed will be required.</p>
<p>30. West Linton Area</p>	<p>SBC</p>	<p><u>Water and Drainage</u> – There is treatment capacity to support new development. Any local network enhancements and site-based infrastructure remains the responsibility of the developer to provide. There is generally available capacity at the larger treatment works serving this area but there may be limited capacity at some of the smaller works. Scottish Water's normal investment rules will apply. If new development is allocated, Scottish Water will monitor the situation to ensure that appropriate capacity can be provided as and when such development comes forward to build.</p> <p>-</p> <p><u>Secondary Schools</u> - Peebles High School has capacity for committed development. There may be very limited additional capacity.</p>	<p><u>Water and Drainage</u> – There is limited capacity at the waste water treatment works for West Linton.</p> <p><u>Secondary School</u> – No change.</p>

## 8 Appendices

Table 8.3

Criteria	Land Availability and Development Capacity		
<p><b>Summary of Methodology</b></p>	<p>Source of Information : Current Local Plans and Local Authorities</p> <p>Consideration has been given to <b>land availability</b>. This is defined as land suitable for development located within or adjacent to existing settlements or adjacent to existing development allocations. It has taken into account any known constraints such as topography, ground conditions, non-compatible neighbouring uses.</p> <p>The <b>development capacity</b> of the area has also been assessed. This takes account of the character of the area and its suitability for significant development. It also takes account of the amount of land already identified for development in existing development plans or with current planning permissions. It is important to consider whether it is appropriate to allocate more development land in these areas. If there is capacity for growth in the longer term but not in the short term, then phasing of development becomes an issue.</p>		
Strategic Assessment Area	Member Authority	Assessment	Update
1. Fife West	FC	Little or no capacity beyond sites identified in the existing local plan.	Potential for development especially in Cairneyhill, Oakley and Crossford with limited potential for Charlestown and Limekilns.
2. Dunfermline Area	FC	Some development potential at the north eastern edge of Dunfermline, Halbeath area.	Development potential to the north west, north and east of Dunfermline and Forth Bridgehead especially Rosyth and Inverkeithing).
3. Glenrothes / Kirkcaldy Area	FC	Potential capacity in the Cowdenbeath, Lochgelly, Kelty and Ballingry area. Potential capacity around Glenrothes area particularly to the south around Thornton and Markinch.	Potential capacity in the Cowdenbeath, Kelty and Cardenden areas. Potential capacity around Glenrothes area particularly to the south around Thornton.

## Appendices 8

4. Fife South	FC	Very limited capacity for future development.	Limited capacity beyond current local plan allocations, however good rail connections along the East Coast Main line.
5. Fife East	FC	Little capacity for development beyond the existing Strategic Land Allocation.	No change.
6. M9 Corridor	WLC	May be potential for future development, principally within existing core development allocations at Winchburgh.	No change.
7. west West Lothian	WLC	May be potential for development, principally within existing core development allocations at Armadale and strategic allocations at Heartlands, Whitburn. However, smaller settlements within the area may also have development potential in the short term.	Substantial allocations for development exist within existing core development area allocations and strategic allocations at Heartlands, Whitburn. There is limited opportunity for further development due to secondary school constraints.
8. M8 Corridor	WLC	May be potential for development, principally within the existing core development areas at Livingston and Almond Valley and East Broxburn / Uphall.	No change.
9. North West Edinburgh	CEC	May be potential for additional development at Queensferry. At Kirkliston, there is already over 600 new houses proposed and not yet built.	No change.
10. West Edinburgh	CEC	A number of potential options to accommodate additional development – both brownfield and greenfield.	No change.
11. South West Edinburgh	CEC	A number of potential options to accommodate additional development.	No change.

## 8 Appendices

12. South Edinburgh	CEC	Limited greenfield land available for strategic development	No change.
13. South East Edinburgh	CEC / MC / ELC	A number of potential options to accommodate additional development.	MLDP MIR considered two options to meet requirements. No scope for additional contributions in period to 2024.
14. Central Edinburgh	CEC	Limited land available beyond existing local plan allocations for business, retail and housing. Windfall opportunities may emerge through the SDP period but difficult to identify at this time.	No change.
15. North East Edinburgh	CEC	Limited land available for strategic development. May be windfall opportunities on brownfield land.	No change.
16. Edinburgh Waterfront	CEC	Significant land already allocated for long term development in the existing local plan. No development capacity for further allocations at this time.	No change.
17. North Edinburgh	CEC	Limited land available for strategic development. More likely to be windfall opportunities on brownfield land.	No change.
18. A7 / A68 / Borders Rail Corridor	MC	Significant land has already been allocated but not yet developed. However there is potential for some additional strategic development, which could benefit from proximity to the Borders rail route. Factors such as topography and coalescence could limit the scale of additional development.	MLDP MIR considered limited reasonable alternatives. No scope for these to come forward as additional contributions in period to 2024.

## Appendices 8

19. A701 Corridor	MC	Significant land has already been allocated but not yet developed. However there is potential for some additional strategic development.	MLDP MIR considered limited reasonable alternatives. No scope for these to come forward as additional contributions in period to 2024.
20. Rural South Lothian Area	MC / ELC	Little potential to accommodate strategic growth: characterised by small, rural settlements with limited transport accessibility. Factors such as topography and coalescence could limit the scale of additional development.	All of Midlothian settlements with potential for expansion have been included in Assessment Areas 13, 18 and 19. There is no scope for strategic growth in the small villages / hamlets in the MC part of this Area.
21. East Lothian West	ELC	A number of potential options to accommodate future development, including expansion of Blindwells. In addition to infrastructure and environmental impacts covered in other criteria, consideration needs to be given to site planning considerations, nature and scale of land uses and potential programme for delivery.	A number of significant existing allocations undeveloped. A number of additional potential options to accommodate further future development in the 'late short-term' to medium / long term. This could include expansion of Musselburgh to the west and east and Longniddry to the south. This could produce capacity for 1,500 to 2,000 units, although this level of additional development may be required to compensate for slippage in the existing land supply rather than provide for additional units and should not be assumed as able to contribute to an increased requirement.
22. East Lothian Central	ELC	Substantial undeveloped strategic housing land allocation in Haddington with some limited potential increase in capacity subject to assessment of infrastructure capacity. Further significant development opportunities in the town limited to avoid impact on landscape setting. Other smaller settlements in the area are not	No change.

## 8 Appendices

			appropriate for strategic housing land releases. Limited employment opportunities available/likely.	
23. East Lothian Coastal	ELC	Little or no capacity beyond sites identified in the current local plan. North Berwick, the logical settlement for any strategic growth in this area, has a major drainage constraint. Limited employment opportunities available.	No change.	
24. East Lothian East	ELC	Substantial and rapid growth over the last 10 years has placed pressure on the town's infrastructure (drainage and education) and has not been accompanied by a commensurate increase in local employment opportunity. Other than that which could complete current settlement strategy, further significant growth could begin to affect landscape setting. Limited capacity for further large-scale housing allocations.	Some potential opportunities south-east Dunbar (400) late short-term to medium term although this level of additional development may be required to compensate for slippage in the existing land supply rather than provide for additional units and should not be assumed as able to contribute to an increased requirement.	
25. Eastern Borders	SBC	Significant capacity identified through recent structure plan and local plan amendment. Little requirement for short term provision. Potential longer term development identified in local plan amendment at Duns and Reston.	The Consolidated Local Plan identifies significant capacity for housing, and potential longer-term housing areas are also identified in, Duns and Reston. Housing completions within the Scottish Borders have continually declined over this last four years from 659 completions in 2007 / 2008 Housing Land Audit to 266 in the 2011 / 2012 Housing Land Audit. For that reason there is limited scope for further allowances to be made particularly in view of marketability factors.	

<p>26. Lauder / Coldstream Area</p>	<p>SBC</p>	<p>Significant capacity identified through recent structure plan and local plan Amendments. Little requirement for short term provision. Potential longer term development identified in local plan amendment at Coldstream.</p>	<p>The Consolidated Local Plan identifies significant capacity for housing, and potential longer-term housing areas are also identified in, Coldstream and Greenlaw. Housing completions within the Scottish Borders have continually declined over this last four years from 659 completions in 2007 / 2008 Housing Land Audit to 266 in the 2011 / 2012 Housing Land Audit. For that reason there is limited scope for further allowances to be made particularly in view of marketability factors.</p>
<p>27. Central Borders</p>	<p>SBC</p>	<p>Significant capacity identified through recent structure plan and local plan Amendments. Little requirement for short term provision. Potential longer term development identified in local plan amendment at Earliston, Hawick, Kelso, and Galashiels.</p>	<p>The Consolidated Local Plan identifies significant capacity for housing, and potential longer-term housing areas are also identified in, Kelso, Earliston, Hawick and Galashiels. Housing completions within the Scottish Borders have continually declined over this last four years from 659 completions in 2007 / 2008 Housing Land Audit to 266 in the 2011 / 2012 Housing Land Audit. For that reason there is limited scope for further allowances to be made particularly in view of marketability factors.</p>
<p>28. South Borders</p>	<p>SBC</p>	<p>Capacity identified through recent structure plan and local plan Amendments. Little requirement for short term provision.</p>	<p>The Consolidated Local Plan identifies capacity for housing within the South Borders. Housing completions within the Scottish Borders have continually declined over this last four years from 659 completions in 2007 / 2008 Housing Land Audit to 266 in the 2011 / 2012 Housing Land Audit. For that reason there is limited scope for further allowances to be made particularly in view of marketability factors and in view of the</p>



8 Appendices

			<p>relative remoteness and the absence of any major settlements in the area where few development proposals are appropriate.</p>
<p>29. Western Borders</p>	<p>SBC</p>	<p>Significant capacity identified through recent structure plan and local plan Amendments. Little requirement for short term provision. Potential longer term development identified in local plan amendment at Peebles and Innerleithen</p>	<p>The Consolidated Local Plan identifies significant capacity for housing, and potential longer-term housing areas are also identified in Peebles and Innerleithen. Housing completions within the Scottish Borders have continually declined over this last four years from 659 completions in 2007 / 2008 Housing Land Audit to 266 in the 2011 / 2012 Housing Land Audit. For that reason there is limited scope for further allowances to be made in view of marketability factors.</p>
<p>30. West Linton Area</p>	<p>SBC</p>	<p>Capacity identified through recent structure plan and local plan Amendments. Little requirement for short term provision.</p>	<p>The Consolidated Local Plan identifies significant capacity for housing. Housing completions within the Scottish Borders have continually declined over this last four years from 659 completions in 2007 / 2008 Housing Land Audit to 266 in the 2011 / 2012 Housing Land Audit. For that reason there is limited scope for further allowances to be made in view of marketability factors.</p>

**Table 8.4**

<b>Criteria</b>	<b>Green Belt</b>
<p><b>Summary of Methodology</b></p>	<p>Structure plans and local plans were reviewed to identify extent of Green Belt, including proposed / draft Green Belts (Dunfermline and West Fife Local Plan). The conclusions of the Edinburgh Green Belt Study December 2008 were also assessed. This was undertaken in 2 stages. Stage 1 to identify those areas of Green Belt of greatest importance in terms of SPP landscape and open space objectives. Stage 2 to explore</p>

## Appendices 8

<p>the development capacity of the areas was considered to be of lesser significance. For the purposes of this assessment, consideration was also given to the potential impact on Countryside Belts (WLC) and Countryside Around Towns (CATS) (SBC). Although not statutory Green Belt, these areas fulfil a similar function in terms of landscape setting and open space around towns.</p> <p>Each strategic assessment area was considered in terms of potential impact on the Green Belt (or countryside belts in WLC and CAT in SBC).</p> <p>Nb. For the areas covered by the Edinburgh Green Belt Study 2008, the reference numbers in the comments column refers to LCAs (Landscape Character Areas) and the text in italics is from the Stage 2 Assessment.</p>			
<b>Strategic Assessment Area</b>	<b>Member Authority</b>	<b>Assessment</b>	<b>Update</b>
1. Fife West	FC	No Green Belt.	No Green Belt.
2. Dunfermline Area	FC	Proposed Green Belt (draft Dunfermline and West Fife LP) on west / south west side of Dunfermline would limit scope for further development (beyond local plan requirements). Green Belt does not extend to the north of Dunfermline.	Green Belt designated to the south west side of Dunfermline, in the adopted Dunfermline & West Fife Local Plan (Nov. 2012).
3. Glenrothes / Kirkcaldy Area	FC	No Green Belt.	No Green Belt.
4. Fife South	FC	No Green Belt.	No Green Belt.
5. Fife East	FC	No Green Belt.	No Green Belt.
6. M9 Corridor	WLC	Countryside Belt (WLLP). Land between Winchburgh (S/W) and Broxburn (N/ W/ SW).	No change.
7. west West Lothian	WLC	Countryside Belt (WLLP) W/ S/ E of Bathgate.	No change.

## 8 Appendices

8. M8 Corridor	WLC	<p>Countryside Belt (WLLP) around Livingston.</p> <p>LCAs 10, 11, 12, 13, 14, 15, 17, 21, 5, 7 (pt); Stage 2 – 11, 14, 17, 21;</p> <p>Of 10 LCAs, only 4 areas of lesser significance.</p> <p>Stage 2 concluded that there may be limited landscape capacity for development south of South Queensferry (14) and very limited landscape capacity at Craigiehall (21). No landscape capacity in the other two areas.</p> <p>Strategic development is likely to have a significant impact on the Green Belt.</p>	No change.
10. West Edinburgh	CEC	<p>LCAs 6,7 (pt), 8, 9, 72 29 (small part); Stage 2 – 6, 8, 9, 72;</p> <p>Of 6 LCAs, 4 are of lesser significance.</p> <p>Stage 2 concluded that landscape capacity for a small area of development south of Cammo housing area (6); potential for business and industrial use at Airport (72).</p> <p>The Green Belt Study doesn't recognise that WEPP 2008 proposes removal of Area 9B (International Business Gateway) from the Green Belt.</p> <p>There is potential for strategic development to be accommodated on non-Green Belt land or Green Belt of lesser significance.</p>	No change.

11. South West Edinburgh	CEC	<p>LCAs 22, 23, 29 (pt), 30, 26, 27, 28, 31, 34 (pt), 35, 36, 38; Stage 2 – 26, 27, 30, 31;</p> <p>Of 12 LCAs, only 4 areas of lesser significance.</p> <p>Stage 2 concluded limited landscape capacity for extension north of Currie and small scale extension north of Balerno (27) and limited landscape capacity for development at Juniper Green and Currie and N of Currie (31). No landscape capacity in other two areas.</p> <p>There is potential for strategic development to be directed to Green Belt of lesser significance.</p>	No change.
12. South Edinburgh	CEC	<p>LCAs 52(pt), 53(pt), 71; Stage 2 – none.</p> <p>Only limited Green Belt land in this area, but it is of high landscape and open space value. Its development would have a significant impact on the Green Belt.</p>	No change.
13. South East Edinburgh	CEC / MC / ELC	<p>LCAs 43(pt), 44(pt), 52(pt), 53(pt), 54, 48, 96, 47, 55, 49, 85(pt), 46, 95, 45, 94; Stage 2 - 43(pt), 44(pt), 47, 85(pt), 46, 95, 45. Of 15 LCAs, 7 are of lesser significance. Stage 2 concluded there is limited landscape capacity for development west of Burdiehouse village and south of Burdiehouse (44) and at Old Craighall (95). There is landscape capacity identified at Melville Nurseries (85) but this has already been taken forward in the Midlothian Local Plan (85). There is potential for strategic development to be directed to Green Belt of lesser significance.</p>	<p>MLDP MIR identifies potential sites, as both preferred and reasonable alternative options within LCA 46, despite the GB Study not identifying any areas with landscape capacity for development, to meet the SESplan requirements. There is no scope to remove further GB land without seriously</p>

## 8 Appendices

			impacting on the landscape / settlement framework for the Shawfair area.
14. Central Edinburgh	CEC	LCAs 56, 57, 58, 60; Stage 2 – none. Green Belt in this area is of high landscape and open space value. Its development would have a significant impact on the Green Belt.	No change.
15. North East Edinburgh	CEC	No Green Belt.	No change.
16. Edinburgh Waterfront	CEC	No Green Belt.	No change.
17. North Edinburgh	CEC	LCAs 1, 2, 3, 4, 50; Stage 2 - none. Only small part of area is Green Belt. But all is of high landscape and open space value. Development on these areas would have a significant impact on the Green Belt.	No change.
18. A7 / A68 / Borders Rail Corridor	MC	LCAs 44(pt), 83(pt), 82(pt), 85(pt), 84, 86, 87(pt), 88(pt). Stage 2 – 44(pt), 83(pt), 85(pt), 86, 88. Of 8 LCAs, 5 are of lesser significance. Stage 2 concluded some landscape capacity for development at South Melville although coalescence risk (86) but none in other areas. Potential for strategic development to be directed to limited areas of Green Belt of lesser significance.	MLDP MIR identifies as a preferred development option the area in the South Melville LCA (86), along with additional Green Belt sites. Measures proposed to mitigate coalescence. No additional areas suggested through GB Study.

## Appendices 8

19. A701 Corridor	MC	LCAs 43 (pt), 44(pt), 80, 81, 82(pt), 83(pt), 77, 78, 79; Stage 2 - 43 (pt), 44(pt), 80, 81, 83(pt), 77, 78. Of 9 LCAs, 7 are of lesser significance. Landscape capacity identified in (44), (80), (81) areas but these had already been taken forward in the Midlothian Local Plan. Limited landscape capacity for development east of Loanhead (83). None in other areas. There is potential for strategic development to be directed to limited areas of Green Belt of lesser significance.	MLDP MIR identifies potential for employment expansion (for an existing user) within the area identified in the GB Study, i.e. LCA 83. MLDP MIR already considering removal of additional areas of Green Belt to meet SESplan requirements. No additional scope for loss of GB land.
20. Rural South Lothian Area	MC / ELC	No Green Belt.	No change.
21. East Lothian West	ELC	LCAs 87(pt), 93, 91, 90, 88(pt), 89, 90, 91, 92, 93; Stage 2 - 88(pt) Of 10 LCAs, only 1 of lesser significance. Stage 2 identifies no landscape capacity for development. Therefore strategic development in the western part of this area is likely to have a significant impact on the Green Belt.	No change.
22. East Lothian Central	ELC	No Green Belt.	No change.
23. East Lothian Coastal	ELC	No Green Belt.	No change.
24. East Lothian East	ELC	No Green Belt.	No change.

## 8 Appendices

25. Eastern Borders	SBC	No Green Belt.	No change.
26. Lauder / Coldstream Area	SBC	No Green Belt.	No change.
27. Central Borders	SBC	Countryside around town (CAT) at Galashiels, Tweedbank, Darnick, Gattonside, Melrose, Newstead, St Boswells and Newtown St Boswells.	No change.
28. South Borders	SBC	No Green Belt.	No change.
29. Western Borders	SBC	No Green Belt.	No change.
30. West Linton Area	SBC	No Green Belt.	No change.

Table 8.5

<b>Criteria</b>	<b>Landscape Designations</b>
<b>Summary of Methodology</b>	<p>With the exception of the City of Edinburgh Council (CEC) and Fife Council (FC) areas, information on Areas of Great Landscape Value and similar designation e.g. Areas of Special Landscape Control in West Lothian was taken from existing local plan maps. In line with SNH guidance on designation of local landscape designations, CEC and FC have undertaken work to identify candidate Special Landscape Areas (cSLAs). These will inform future local development plans and will replace the existing AGLV designations in existing local plans. In the CEC and FC areas, these cSLAs have been used in this assessment.</p> <p>Mapped information was gathered across the SESplan area on the location of historic gardens and designed landscapes.</p>

	All strategic assessment areas have been considered based on potential impact that development would have on land of high landscape quality.		
<b>Strategic Assessment Area</b>	<b>Member Authority</b>	<b>Assessment</b>	<b>Update</b>
1. Fife West	FC	Part of cSLA at northern end.	The area to the north of Saline is designated a Local Landscape Area (Dunfermline & West Fife Local Plan 2012).
2. Dunfermline Area	FC	cSLAs to the north and south of this area.	Designated Local Landscape Areas to the north and south of Dunfermline (Dunfermline & West Fife Local Plan 2012).
3. Glenrothes / Kirkcaldy Area	FC	cSLA to north west of Glenrothes.	Designated SLA to north of Glenrothes (Mid Fife Local Plan 2012).
4. Fife South	FC	Significant AGLV coverage (add details of which AGLV for consistency).	Almost all of the area is designated a Local Landscape Area (Dunfermline & West Fife Local Plan 2012 / Mid Fife Local Plan 2012).
5. Fife East	FC	No designated areas of local landscape value.	The Wemyss area, along the Fife coast, is designated a Local Landscape Area (Mid Fife Local Plan 2012).
6. M9 Corridor	WLC	Bathgate Hills and River Avon Valley, Forth Shore, Airngath Hills AGLVs.	In line with SNH guidance on designation of local landscape designations, WLC has undertaken work to identify candidate Special Landscape Areas (cSLAs). These will inform future local development plans and will replace the existing AGLV designations in existing local plans. It is anticipated that the outputs from the local landscape designation review will be reported to



## 8 Appendices

				committee in late 2013. Seven areas have been identified as potential cSLAs largely reflecting current AGLVs.
7. west West Lothian	WLC	Bathgate Hills and River Avon Valley, Blackridge Heights AGLVs and some Areas of Special Landscape Control.		In line with SNH guidance on designation of local landscape designations, WLC has undertaken work to identify candidate Special Landscape Areas (cSLAs). These will inform future local development plans and will replace the existing AGLV designations in existing local plans. It is anticipated that the outputs from the local landscape designation review will be reported to committee in late 2013. Seven areas have been identified as potential cSLAs largely reflecting current AGLVs.
8. M8 Corridor	WLC	Almond & Linhouse Valleys AGLV and some Areas of Special Landscape Control.		In line with SNH guidance on designation of local landscape designations, WLC has undertaken work to identify candidate Special Landscape Areas (cSLAs). These will inform future local development plans and will replace the existing AGLV designations in existing local plans. It is anticipated that the outputs from the local landscape designation review will be reported to committee in late 2013. Seven areas have been identified as potential cSLAs largely reflecting current AGLVs.
9. North West Edinburgh	CEC	Includes Southern Forth Coast, Lower Almond, Dundas and Craigie Hill cSLAs. Number of Designed Landscapes.		No change.
10. West Edinburgh	CEC	Includes Cammo and part of Gogar cSLAs. Designed Landscape.		No change.

## Appendices 8

11. South West Edinburgh	CEC	Includes Upper Almond, Ratho Hills, Water of Leith – west and part of Gogar cSLAs.	No change.
12. South Edinburgh	CEC	Includes Craiglockhart and part of Water of Leith west, Pentlands and Braid Hills cSLAs.	No change.
13. South East Edinburgh	CEC / MC / ELC	Includes Craigmillar Castle, The Drum, Edmonstone and part of Braid Hills cSLAs. Some Designed Landscapes.	No change.
14. Central Edinburgh	CEC	Includes Water of Leith – New Town, Princes Street Gardens, Calton Hill, Holyrood cSLAs and some Designed Landscapes.	No change.
15. North East Edinburgh	CEC	None.	None.
16. Edinburgh Waterfront	CEC	None.	None.
17. North Edinburgh	CEC	Includes Corstorphine Hill and Inverleith CSLA.	No change.
18. A7 / A68 / Borders Rail Corridor	MC	Significant AGLV coverage close to existing settlements and Designed Landscapes.	MLDP MIR is consulting on proposed changes to local landscape designation, i.e. proposed Special Landscape Areas. Minimal areas proposed for removal from protected areas. None would provide scope for development.

## ∞ Appendices

19. A701 Corridor	MC	AGLVs and Designed Landscapes to south of Penicuik and close to rivers.	MLDP MIR is consulting on proposed changes to local landscape designation, i.e. proposed Special Landscape Areas. Changes proposed for this corridor will not provide scope for development.
20. Rural South Lothian Area	MC / ELC	Land in Midlothian is part of a Moorfoots / Lammermuirs AGLV.	MLDP MIR is consulting on proposed changes to local landscape designation, i.e. proposed Special Landscape Areas. Proposed changes are relatively minimal and would not remove protection from the majority of this Assessment Area within Midlothian.
21. East Lothian West	ELC	Coastal Stretch from Seton Sands to Longniddry is AGLV.	No change.
22. East Lothian Central	ELC	Traprain Law, Garleton Hills and some designed Landscapes.	No change.
23. East Lothian Coastal	ELC	North Berwick Law, Coastal Stretch from Aberlady to North Berwick and some Designed Landscapes.	No change.
24. East Lothian East	ELC	Coastal Stretch from North Berwick through Dunbar to ELC Boundary is AGLV.	No change.
25. Eastern Borders	SBC	Coastal Stretch north of Eyemouth is AGLV. Designed Landscapes around a number of settlements.	Since the Assessment was produced SBC have undertaken a wholesale review of local landscape designations which has resulted in AGLVs being replaced by SLAs. The Berwickshire Coast SLA covers land on the coastal stretch south of Eyemouth to the Border; and north to St Abbs Head (where the boundary of the SDA in the Proposed Plan is). Settlements are not included within the SLAs.

## Appendices 8

			There are designed landscapes to the south of Eyemouth, north east of Ayton and north of Duns.
26. Lauder / Coldstream Area	SBC	No AGLV. Designed Landscapes around a number of settlements.	<p>Since the Assessment was produced SBC have undertaken a wholesale review of local landscape designations which has resulted in AGLVs being replaced by SLAs. The Lammermuir Hills SLA covers land to the A68, extending south along the A697 to where the southern upland way crosses east to west.</p> <p>There are designated landscapes on the eastern side of Lauder and on the western side of Coldstream.</p>
27. Central Borders	SBC	National Scenic Area and AGLV. Designed Landscapes around a number of settlements.	<p>Since the Assessment was produced SBC have undertaken a wholesale review of local landscape designations which has resulted in AGLVs being replaced by SLAs.</p> <p>The Central Borders area includes the Eildon Hills National Scenic Area and three Special Landscape Areas, the Tweed Lowlands, Teviot Valleys and the Tweed, Ettrick and Yarrow Confluences.</p> <p>There are a number of Gardens and Designed Landscapes within the Central Borders area.</p>
28. South Borders	SBC	No AGLV. Designed Landscapes around a number of settlements.	<p>Since the Assessment was produced SBC have undertaken a wholesale review of local landscape designations which has resulted in AGLVs being replaced by SLAs.</p>

## 8 Appendices

			<p>The South Borders area includes part of the Tweed, Ettrick and Yarrow Confluences Special Landscape Area and the Cheviot Foothills Special Landscape Area as well as the Bowhill Garden and Designed Landscape.</p>
29. Western Borders	SBC	<p>AGLV around Peebles. Designed Landscapes around a number of settlements.</p>	<p>The newly designated Tweed Valley Special Landscape Area almost entirely wraps around the settlement of Peebles, and extends down the valley south east and entirely wraps around the settlements of Innerleithen and Walkerburn.</p> <p>There are Gardens and Designed Landscapes to the south east of Peebles and to the south of Innerleithen.</p>
30. West Linton Area	SBC	<p>No AGLV. Designed Landscapes around a number of settlements.</p>	<p>The newly designated Pentlands Special Landscape Area to the north west of the settlement of West Linton. The SLA extends as far south to the settlement of Dolphinton and to the north and beyond Carlops.</p> <p>There are Gardens and Designed Landscapes to the north of Eddleston and to the north east of Carlops.</p>

**Table 8.6**

<b>Criteria</b>	<b>Regeneration Potential</b>
<b>Summary of Methodology</b>	<p>Source of Information - The Scottish Index of Multiple Deprivation (SIMD) 2009.</p> <p>The Scottish Index of Multiple Deprivation (SIMD) 2009 identifies small area concentrations of multiple deprivation across all of Scotland in a fair way. The SIMD provides a relative measure of deprivation which means that the main output from SIMD - the SIMD ranks - can be used to compare data zones by providing</p>

	<p>a relative ranking from most deprived (rank 1) to least deprived (rank 6,505). The SIMD cannot be used to determine 'how much' more deprived one data zone is than another e.g. it is not possible to say that data zone X, ranked 50, is twice as deprived as data zone Y, ranked 100.</p> <p>The SIMD combines 38 indicators across 7 domains, namely: income, employment, health, education, skills and training, housing, geographic access and crime. The overall index is a weighted sum of the seven domain scores. The weighting for each domain is based on the relative importance of the domain in measuring multiple deprivation, the robustness of the data and the time lag between data collection and the production of the SIMD. The domain weightings were subject to sensitivity analysis to assess the effects of any changes in weights on the overall index ranks.</p> <p>The SIMD ranks all of Scotland's datazones from the most deprived to the least. For the Stage 2 Assessment, these ranks were rebased to rank only the datazones within the SESplan area from the most deprived to the least. Using small area population estimates at datazone level, it was possible to calculate the proportion of the population resident in each of the 30 zones that were living within the most deprived 10% of the SESplan area.</p>		
<p><b>Strategic Assessment Area</b></p> <p>1. Fife West</p> <p>2. Dunfermline Area</p>	<p><b>Member Authority</b></p> <p>FC</p> <p>FC</p>	<p><b>Assessment</b></p> <p>Pockets of high deprivation in places such as High Valleyfield and Oakley.</p> <p>Pockets of High Deprivation in places such as Abbeyview, Touch and Broomhall.</p>	<p><b>Update</b></p> <p>Pockets of high deprivation in places such as High and Low Valleyfield and Oakley and Comrie.</p> <p>High Deprivation in places such as Abbeyview and Touch in Dunfermline. Also areas of deprivation in Inverkeithing and Rosyth.</p>

## 8 Appendices

3. Glenrothes / Kirkcaldy Area	FC	New development could bring regeneration benefits to a number of existing communities.	Pockets of deprivation in and around Glenrothes and Kirkcaldy. Also areas of deprivation in Lochgelly, Cowdenbeath and Kelty. Higher deprivation in Balingry and the Lochs.
4. Fife South	FC	Committed development will reuse brownfield land at the Waterfront. This area is generally not considered deprived.	No areas of deprivation, with the exception of Burntisland Docks.
5. Fife East	FC	Potential for regeneration benefits in Levenmouth area.	High deprivation in parts of Levenmouth. Potential for regeneration benefits in Levenmouth area.
6. M9 Corridor	WLC	Limited regeneration opportunities.	No change.
7. west West Lothian	WLC	Significant opportunity for regeneration benefits.	No change.
8. M8 Corridor	WLC	Some potential for regeneration.	No change.
9. North West Edinburgh	CEC	Limited opportunity for regeneration benefits.	No change.
10. West Edinburgh	CEC	Recent Rural West Edinburgh Local Plan Alteration identified housing led regeneration proposals in Newbridge and Ratho Station. Further regeneration opportunities limited.	No change.
11. South West Edinburgh	CEC	Limited regeneration opportunities.	No change.

## Appendices 8

12. South Edinburgh	CEC	Some areas of significant deprivation such as Sighthill and Wester Hailes. But other parts of this area are more affluent.	No change.
13. South East Edinburgh	CEC / MC / ELC	Already significant regeneration activity and proposals in this area in Craigmiller and through South East Wedge allocations.	No change.
14. Central Edinburgh	CEC	Mixed character area – some pockets of high deprivation located next to more affluent communities.	No change.
15. North East Edinburgh	CEC	Development in the adjacent Waterfront area will bring benefit to North East Edinburgh.	No change.
16. Edinburgh Waterfront	CEC	The scoring reflects the limited number of people currently living in this area. Development here will bring regeneration benefits for the adjacent areas of North and North East Edinburgh.	No change.
17. North Edinburgh	CEC	Development in the adjacent Waterfront area will bring benefit to North Edinburgh.	No change.
18. A7 / A68 / Borders Rail Corridor	MC	There are some areas of deprivation but the scope for regeneration benefit related to new development is nil. All the land adjacent to areas of deprivation is already allocated. Committed development will have the scope to address some of the deprivation issues but there is no scope for further benefit from new allocations.	No change.
19. A701 Corridor	MC	Limited regeneration opportunities.	No change.



## 8 Appendices

20. Rural South Lothian Area	MC / ELC	Limited regeneration opportunities.	No change.
21. East Lothian West	ELC	There are some areas of deprivation but the scope for regeneration benefit related to new development is limited.	No change.
22. East Lothian Central	ELC	Limited regeneration opportunities.	No change.
23. East Lothian Coastal	ELC	Limited regeneration opportunities.	No change.
24. East Lothian East	ELC	Limited regeneration opportunities.	No change.
25. Eastern Borders	SBC	Some smaller scale regeneration opportunities associated with main towns.	No change.
26. Lauder / Coldstream Area	SBC	Some smaller scale regeneration opportunities associated with main towns.	No change.
27. Central Borders	SBC	Some areas of deprivation. Regeneration opportunities associated with main towns.	No change.
28. South Borders	SBC	Limited regeneration opportunities.	No change.
29. Western Borders	SBC	Some regeneration opportunities associated with main towns.	No change.
30. West Linton Area	SBC	Limited regeneration opportunities.	No change.

Table 8.7

<b>Criteria</b>		<b>Prime Agricultural Land</b>		
<b>Summary of Methodology</b>	Prime agricultural land is defined as Classes 1, 2 and 3. 1 on the Macaulay Institute "Land Capability for Agriculture Maps". Each of the areas has been assessed in relation to potential loss of prime agricultural land.			
<b>Strategic Assessment Area</b>	<b>Member Authority</b>	<b>Assessment</b>	<b>Update</b>	
1. Fife West	FC	Majority of land outwith built up areas is prime quality.	No change.	
2. Dunfermline Area	FC	Outwith the built up areas, majority of land is prime quality.	No change.	
3. Glenrothes / Kirkcaldy Area	FC	Some prime with significant pocket of land unsuitable for agricultural use around Cardenden / Lochgelly.	No change.	
4. Fife South	FC	Some pockets of prime quality land.	No change.	
5. Fife East	FC	Majority of land outwith built up areas is prime quality.	No change.	
6. M9 Corridor	WLC	All prime quality with the exception of the higher ground to the south of Linlithgow.	No change.	
7. west West Lothian	WLC	Some areas of prime land adjacent to Bathgate and Armadale.	No change.	
8. M8 Corridor	WLC	Land to the east of Livingston is prime quality.	No change.	

## 8 Appendices

9. North West Edinburgh	CEC	Predominantly prime quality except coastal land to east of Queensferry.	No change.
10. West Edinburgh	CEC	All land outwith built up areas is prime quality.	No change.
11. South West Edinburgh	CEC	Most of the area to south of Currie and Balerno is not prime quality but the remainder of this area is.	No change.
12. South Edinburgh	CEC	Nearly all built up area.	No change.
13. South East Edinburgh	CEC / MC / ELC		No change.
14. Central Edinburgh	CEC	All built up area.	No change.
15. North East Edinburgh	CEC	All built up area.	No change.
16. Edinburgh Waterfront	CEC	All built up area.	No change.
17. North Edinburgh	CEC	All built up area.	No change.
18. A7 / A68 / Borders Rail Corridor	MC	All prime quality except land adjacent to watercourses.	No change.
19. A701 Corridor	MC	The northern part of this area is predominantly prime quality, with land adjacent to and to the south of Penicuik of lesser quality.	No change.
20. Rural South Lothian Area	MC / ELC	All prime quality except the area to the south of Gorebridge.	No change.
21. East Lothian West	ELC	All land outwith built up areas is prime quality.	No change.
22. East Lothian Central	ELC	All prime quality except higher ground just to north of Haddington	No change.

23. East Lothian Coastal	ELC	The area between Gullane and North Berwick along the coast is not prime quality. Prime quality land is located further inland to the south and east.	No change.
24. East Lothian East	ELC	All land outwith built up areas is prime quality.	No change.
25. Eastern Borders	SBC	Mostly prime agricultural land except area to the west around Cranshaws and Ellemford	No change.
26. Lauder / Coldstream Area	SBC	Prime agricultural land in eastern half of area but land west of Gordon is not.	Add "north and west of Gordon".
27. Central Borders	SBC	Area around Kelso, Smailholm and Ancrum is prime agricultural land. The area west of the A68 is not.	Remove "The area west of the A68 is not".
28. South Borders	SBC	Little prime agricultural land.	No change.
29. Western Borders	SBC	Little prime agricultural land.	No change.
30. West Linton Area	SBC	Little prime agricultural land.	No change.

Table 8.8

Criteria	Transport
<b>Summary of Methodology</b>	<p>The information here is drawn from the MVA transport appraisal work and the Transport Scotland response to the transport appraisal. Accessibility was assessed separately. This table looks at capacity issues relating to transport infrastructure. The MVA 2032 reference case models what the impacts on transport infrastructure would be in 2032 if committed transport schemes implemented. The findings were then used to model "do something" scenarios for potential transport schemes but these are not included here for the purposes of the spatial strategy assessment. Details are available on page 4 of Appendix of the Transport Technical Note available at <a href="http://www.sesplan.gov.uk/transport/technicalnotes/mva/transportgreennetwork&amp;docsearch=right+to+Search+right+to+Search+right+to+Search+right+to+Search">http://www.sesplan.gov.uk/transport/technicalnotes/mva/transportgreennetwork&amp;docsearch=right+to+Search+right+to+Search+right+to+Search+right+to+Search</a></p>

## 8 Appendices

Strategic Assessment Area	Member Authority	Assessment
1. Fife West	FC	Pressure on junctions north of Kincardine Bridge. Increasing delays on the A985 and A907 but traffic flows within expected limits. Lack of rail link to Edinburgh. Local roads inadequate for significant growth.
2. Dunfermline Area	FC	Increase in junction delays and deterioration in level of service in and around Dunfermline. Forth Replacement Crossing does not provide significant additional capacity. Potential for improvements as part of Forth Replacement Crossing public transport strategy. Funding secured for Park and Ride site at Halbeath and bus hard shoulder running from south of Halbeath to Newbridge. There are plans for a northern Dunfermline link road. Inverkeithing to Halbeath railway line is a Strategic Transport Project Review (STPR) proposal but no funding yet committed.
3. Glenrothes / Kirkcaldy Area	FC	A92 / Redhouse roundabout congestion at peak times – Fife Council and Transport Scotland working with existing developer to identify mitigation measures which will be developer funded; general deterioration in level of public transport services on A92 west of A910. Cross Forth road and rail capacity issues affect this area. Current rail infrastructure in Fife has spare capacity
4. Fife South	FC	Local roads inadequate for significant growth in the Burntisland / Kinghorn area. Increase in delays on the A921 approaching Dalgety Bay / Inverkeithing. Cross Forth road and rail capacity issues affect this area.
5. Fife East	FC	
6. M9 Corridor	WLC	Transport Scotland's position with regard to Winchburgh rail station is changing. Much could depend on EGIP and proposals for High Speed Rail 2. Non-rail public transport interventions need to be considered. Additional park and ride parking spaces recently provided at Linlithgow Rail Station. Increased junction delays in Linlithgow and B8046 / A904 junction. General deterioration of public transport services on M9 and A904.

## Appendices 8

		<p>The strategic pinch points on existing road infrastructure are at Junctions 3 and 4 of the M8; and in a wider context sites located in the proximity of the M8, M9 and A89 corridors. Together these sites have a potential cumulative effect at Junction 1 of the M9 at Newbridge where there are capacity issues which have implications for the strategically important national developments in west Edinburgh area. This is a key constraint to growth. Transport Scotland support the principle of west facing slips on the M9 at junction 3 provided these are wholly developer funded. The western approaches from West Lothian into Edinburgh along the A89 / A8 and M8 suffer congestion at peak times. There is pressure for further park and ride facilities along the Edinburgh to Glasgow rail line particularly at Linlithgow. However, this station and train services are heavily congested.</p> <p>There is a need for improved public transport measures to reduce public transport journey times along the A89 / A8 corridor. The opening of the improved slips at J1A on the M9 has provided new motorway connections to and from the Forth Bridge, Fife and the north.</p> <p>As part of the Managed Crossing Strategy for the Forth Replacement Crossing, a Public Transport Strategy was developed by Transport Scotland in consultation with a number of partner organisations, including West Lothian Council, and published in 2010. The strategy includes a number of traffic management proposals (ITS (Integrated Transport Systems), bus lanes on the M8 and M9) that may impact on or complement transport initiatives identified in the current West Lothian Local Plan such as the new motorway junction at Winchburgh and identifies the key role of improvements at Newbridge to improve public transport access.</p>
7. west West Lothian	WLC	Increased delays at junctions in Bathgate, Armadale and Whitburn. Increased delays on the A801 and A7066. The proposed upgrading of the A801 between Grangemouth and the M8 is included in the STPR. There has been a significant deterioration of level of public transport services on the M8.

## 8 Appendices

		<p>The A801 is a key national and well used local route. A key improvement to this route would be the introduction of the long planned 'missing link' to replace the existing Avon Gorge at the northern end of the route. The accessibility of Armadale and Blackridge as result of the completion of the Edinburgh to Glasgow via Airdrie rail line potentially makes these areas, from a transportation perspective, suitable for future development.</p> <p>In addition the new junction on the M8 at Heartlands improves accessibility at Whitburn and creates opportunities to build on the public transport interchange identified at the new junction. This could be further improved by the provision of new cycle and bus links to the new station at Armadale.</p>
<p>8. M8 Corridor</p>	<p>WLC</p>	<p>Impact of development on the M8 needs to be considered. Some junctions in Broxburn and Livingston are under pressure. The A899 (Livingston), A71 and the A89 are all experiencing increased delays. The A801 meets the M8 at junction 4 and early delivery of improvements identified in the West Lothian Local Plan would help support development in this area. Capacity issues in and around West Edinburgh have implications for this area.</p> <p>The existing rail link is the Bathgate - Edinburgh line, and provides a direct link to Glasgow Queen Street (lower level) and has new stations at Armadale, Bathgate and Blackridge, while the existing stations at Livingston North and Uphall Station have been improved.</p> <p>Increased accessibility to the rail network has been achieved by lengthening of platforms at Uphall Station, Livingston North and Bathgate stations to accommodate longer trains and the introduction of extra parking at rail station car parks; the completion of Phase 1 of Fastlink providing improved access to more direct strategic bus services to Edinburgh; low frequency direct bus service to Glasgow; and re-opening of the Airdrie to Bathgate rail line including the provision of parking at the new stations in Armadale and Blackridge.</p>

		<p>This corridor also provides for strategic bus based public transport links between Glasgow and Edinburgh using the M8 while bus links between Bathgate, Broxburn and Livingston use the A89. The M8 is the main strategic road. Both routes converge on Newbridge Roundabout which is identified as a key constraint to continuing growth along this corridor.</p> <p>The construction of J4a is underway and its completion improves accessibility to Whitburn and the surrounding area.</p>
9. North West Edinburgh	CEC	<p>Increased delays on the M9 spur and through Kirkliston. Barnton junction is a significant capacity constraint. Capacity issues in and around West Edinburgh have implications for this area. Implications of the Forth Replacement Crossing and its associated links need to be considered.</p>
10. West Edinburgh	CEC	<p>Significant committed infrastructure e.g. tram, Gogar Station, Edinburgh – Glasgow (Rail) Improvement Programme (EGIP). West Edinburgh Transport Appraisal identified further necessary interventions associated with development at the airport, Royal Highland Centre and International Business Gateway. These should be delivered through the West Edinburgh Development Partnership. Capacity at Newbridge junction is a significant constraint on the strategic network which will need to be addressed by development in West Edinburgh, West Lothian and potentially Fife. Increased delays on the A8, Gogar and Edinburgh Park area.</p>
11. South West Edinburgh	CEC	<p>Increase to number of local services to Currie Station not supported by Transport Scotland because of impact on Glasgow-Edinburgh journey times. Once EGIP is delivered it would be for local interests to develop the case for further enhancements, demonstrating how these can be integrated into the national network. Proposal to upgrade Hermiston P&amp;R. Increase in delays along the A70 and A71 approaches to Edinburgh. Growth in congestion around Hermiston Gait and the Calder junction.</p>



## 8 Appendices

12. South Edinburgh	CEC	In 2007 the A720 (city bypass) already operating at or near capacity at peak hours. Increased delays are forecast on A720 and associated junctions. Junction improvements will push congestion at pinch points elsewhere on the network.
13. South East Edinburgh	CEC / MC / ELC	<p>The A720 (city bypass) already operating at or near capacity at peak hours. Very significant increase in delays forecast on eastern stretches of the A720 and associated junctions including Sheriffhall and Old Craighall. Transport Scotland has significant concerns regarding the impact of development on Sheriffhall junction. There are established principles for developer contributions towards the Sheriffhall roundabout as part of South East wedge developments. This is a significant infrastructure constraint for which there is no clear delivery mechanism beyond that which is already committed.</p> <p>Rail based park and ride at Newcraighall and Brunstane and bus based at Sheriffhall. Potential for public transport improvements with the Borders Rail link and South East tram.</p> <p>Borders Rail project in progress which will deliver associated bridge infrastructure to assist delivery of Shawfair new community.</p>
14. Central Edinburgh	CEC	Area at the heart of the regional public transport network and well served by existing rail and bus services. Proposed tram will provide further improvements.
15. North East Edinburgh	CEC	Significant transport infrastructure required as identified in the North East Transport Action Plan.
16. Edinburgh Waterfront	CEC	Significant transport infrastructure required as identified in the North East Transport Action Plan. Tax Incremental Finance (TIF) approach to be used to fund infrastructure delivery.
17. North Edinburgh	CEC	Junction delays at Maybury, Barnton, Quality St, Blackhall and Gyle. Development proposals at West Edinburgh may exacerbate these delays.

## Appendices 8

18. A7 / A68 / Borders Rail Corridor	MC	<p>Additional capacity is required at the A720 Sheriffhall junction with capacity issues also at other junctions including Gilmerton and Lasswade. There are established principles for developer contributions towards the Sheriffhall roundabout as part of South East Wedge developments. This is a significant infrastructure constraint for which there is no clear delivery mechanism beyond that which is already committed. Transport Scotland raising significant concerns re the scale of development in Midlothian, and impact on trunk roads / junctions. No ready solution to resolve issues.</p> <p>There are significant delays on the A6106, A68, A7, A768 and B704 approaches to Edinburgh. Park and ride capacity at stations on the Borders Railway need to be considered. MLDP MIR transport modelling demonstrating significant congestion issues affecting roads/ junctions on trunk and non-trunk roads in the corridor.</p>
19. A701 Corridor	MC	<p>Increased junction delays along the A701 including Straiton junction on the A720 city bypass. Park and Ride site at Straiton. Some additional delay on A702 from Penicuik junction approaching Lothianburn. Park and Ride consented at Lothianburn but no funding commitment. Transport Scotland raising significant concerns re the A701 and A702 junctions on the A720 city bypass. Concerned about the scale of development in Midlothian, and impact of this additional traffic on trunk roads / junctions. No ready solution to resolve issues. MLDP MIR transport modelling demonstrating significant congestion issues affecting roads / junctions on trunk and non-trunk roads in the corridor. MLDP MIR consulting on a new A701 bypass road to resolve congestion, but prospect of delivery relatively low / may not resolve A720 / A701 junction issues.</p>
20. Rural South Lothian Area	MC / ELC	<p>Road network unsuitable for significant growth; no planned public transport investment that will support this location. Modest deterioration on the A6093, no issues on the A68 in this area.</p>

8 Appendices

<p>21. East Lothian West</p>	<p>ELC</p>	<p>Increased congestion on the A198 and the A1 approaching Edinburgh has resulted in a reduced level of public transport service from Tranent to Old Craighall and beyond. Old Craighall junction on the A1 requires upgrading. There are ongoing discussions involving Transport Scotland, East Lothian Council and SESplan to resolve issues at Old Craighall junction. There has been no resolution, although a recent appeal decision suggested that the issue was for Transport Scotland to address rather than East Lothian. Bankton, Dolphingstone and Wallyford junctions all have limited capacities. Existing proposal for a rail halt at Blindwells which is not currently supported by Transport Scotland. A study on the business case for rail enhancements between Edinburgh and Newcastle via Dunbar was completed in 2011. There has been a very limited increase in Edinburgh to Dunbar services but not to the extent that intervening stations have any significantly greater carrying capacity. Potential capacity issues on North Berwick train services.</p>
<p>22. East Lothian Central</p>	<p>ELC</p>	<p>Road networks are operating within capacity in this area. However the capacity problems at Old Craighall, Bankton, Dolphingstone and Wallyford junctions on the A1 also affect this area (see comments on Area 21). Potential capacity issues on North Berwick train services (see reference to rail study in Area 21). There is a study into possible new stations at Reston and East Linton ongoing. No Transport Scotland commitment at this stage.</p>
<p>23. East Lothian Coastal</p>	<p>ELC</p>	<p>Minor but not significant delays on A198 coastal route. The capacity problems at Old Craighall junction on the A1 also affect this area. Potential capacity issues on North Berwick train services (see reference to rail study in Area 21).</p>
<p>24. East Lothian East</p>	<p>ELC</p>	<p>Possible trunk road constraints depending on the location and scale of future development. The capacity problems at Old Craighall junction on the A1 also affect this area (see comments on Area 21). There has been a very limited increase in Edinburgh to Dunbar services but not to the extent that Dunbar and intervening stations have any significantly greater carrying capacity.</p>

25. Eastern Borders	SBC	<p>There is currently no commitment for the proposed new rail station at Reston. However the East Coast rail study (see Area 21) will include an appraisal of the potential for this and the Edinburgh-Berwick-Upon-Tweed Local Rail Study, which was finalised in June 2013, has highlighted the potential for new station facilities at Reston. The latter has been presented to Scottish Government for comment. If opportunities are identified these will be considered by Transport Scotland but implementation will be subject to available funding. There are low levels of commuting to Edinburgh.</p>
26. Lauder / Coldstream Area	SBC	<p>The Borders Rail project will improve connectivity on the A7 corridor. This includes a station at Stow. No significant regional issues in this area. There are low levels of commuting to Edinburgh. There will be modifications to the road network around Falahill.</p>
27. Central Borders	SBC	<p>Some increase in delays on the A6999 (Selkirk – Kelso). The B6374 Galashiels to Melrose corridor has capacity issues. Selkirk bypass not included in the STPR. Instead the STPR recommends active route management and targeted individual investments to provide safety and operational improvements on the A7. Some delays on the A6091 and A68 junction. Galashiels town centre local network issues. The Borders Rail project and the Galashiels Transport Interchange with new stations at Tweedbank and Stow will improve connectivity.</p>
28. South Borders	SBC	<p>Improving transport links to the Central Borders, Peebles and Carlisle is particularly important for the rural communities within this area.</p>
29. Western Borders	SBC	<p>Improvements to the A703 (outwith the Scottish Borders at the Leadburn Junction) to improve links with the City are required. New river crossing required at Peebles if further development.</p>
30. West Linton Area	SBC	<p>No significant regional issues in this area, however there is congestion within West Linton village centre.</p>

## 8 Appendices

Table 8.9

<b>Strategic Assessment Area</b>	<b>Fife West</b>
<b>Reference Number</b>	<b>1</b>
<b>Description of Area</b>	<p>Area to west of Dunfermline served by two main roads (A985 and A907). No rail services. Predominantly rural character and a number of existing villages. Coastal area along Firth of Forth is high biodiversity value and may be at risk of flooding.</p> <p>Existing allocations for around 1,000 houses.</p>
<b>Overall Assessment</b>	<p>Development in this area would have no impact on the Green Belt and limited impact on areas of high landscape value. It could bring regeneration benefits to existing communities. Development is likely to result in loss of prime agricultural land. The accessibility and infrastructure assessment were reasonable.</p> <p>However, there is limited capacity for additional strategic development.</p>
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
	NO
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
	NO

Table 8.10

Strategic Assessment Area	Dunfermline Area
Reference Number	2
<b>Description of Area</b>	
<p>This area is dominated by the main settlement of Dunfermline which has two train stations and a major bus station. There are also train stations at Rosyth and Inverkeithing. It has excellent road links within Fife and beyond.</p> <p>Pockets of high landscape value to west and northwest. Includes proposed Dunfermline Green Belt to the South West. Coalescence between Dunfermline and Rosyth, Crossford and Townhill is an issue.</p> <p>Significant amounts of development land already allocated (sites for over 7,000 houses).</p>	
<b>Overall Assessment</b>	
<p>This area is the most accessible in Fife and has capacity for further strategic allocations, particularly to the north of Dunfermline. Existing development frameworks undertaken by Fife Council have highlighted opportunities to the north of the town to augment elements of the existing strategic land allocation and link in with future and existing transport infrastructure.</p> <p>Development may bring regeneration benefits but is also likely to result in loss of prime agricultural land. The impact of potential development sites on the Green Belt and landscape designations can be assessed through future local development plans.</p>	
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
YES	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
YES	

## 8 Appendices

Table 8.11

<b>Strategic Assessment Area</b>	<b>Glenrothes / Kirkcaldy Area</b>
<b>Reference Number</b>	<b>3</b>
<b>Description of Area</b>	<p>Glenrothes and Kirkcaldy are relatively well served by rail and bus services. Cardenden, Cowdenbeath and Lochgelly also have train stations. Excellent road links within Fife and beyond. Some potential coastal and inland flooding. Regional Park to north and north west of Glenrothes and AGLV to west of Kirkcaldy.</p> <p>Coalescence between settlements is an issue. Significant amounts of development land already allocated (sites for over 11,000 houses) particularly in the Kirkcaldy area with Kirkcaldy East (2,850 houses) and Kirkcaldy South West (1,000 houses). Also significant growth planned around East Glenrothes / Markinch and Lochgelly.</p>
<b>Overall Assessment</b>	<p>This area scored well across all the assessment criteria. In particular, in terms of capacity to accommodate further strategic development and regeneration potential. There is no Green Belt in this area and relatively limited coverage of prime agricultural land and landscape designations. Accessibility to employment is not as good as some other parts of Fife but it scored well in terms of accessibility to retail and hospital facilities.</p> <p>This Mid Fife area has already been identified through the long term aspirations of the Fife Structure Plan and National Planning Framework 2 as being possible locations for future growth, regeneration and environmental improvement. The best opportunities for future strategic growth, linking in with transport infrastructure and regeneration opportunities are in the Upper Leven / Ore Valley.</p>
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
	YES
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	

<b>Strategic Assessment Area</b>	<b>Glenrothes / Kirkcaldy Area</b>
<b>Reference Number</b>	<b>3</b>
YES	

Table 8.12

<b>Strategic Assessment Area</b>	<b>Fife South</b>
<b>Reference Number</b>	<b>4</b>
<b>Description of Area</b>	<p>Train Stations at Kinghorn, Burntisland, Aberdour and Dalgety Bay. Bus links are reasonable. Excellent road links at Dalgety Bay but less good towards the east. Coastal character adjacent to Firth of Forth and AGLV in the north. Potential coastal flooding.</p> <p>Existing allocations for around 900 houses.</p>
<b>Overall Assessment</b>	Development in this area would have no impact on the Green Belt and limited loss of prime agricultural land. With 4 train stations, it has good public transport accessibility. Large parts of this area are covered by landscape designations. There is little capacity for future development on a strategic scale.
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	NO
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	NO



## 8 Appendices

Table 8.13

<b>Strategic Assessment Area</b>	<b>Fife East</b>
<b>Reference Number</b>	<b>5</b>
<b>Description of Area</b>	
Based around the Levenmouth area (Leven, Methil and Buckhaven). No existing rail station but link is proposed. Has bus station. Coastal character with AGLV to east. Relatively remote from remainder of SESplan area. Coalescence between settlements is an issue.	
Existing allocations for around 2,300 houses.	
<b>Overall Assessment</b>	
Development here would not result in loss of Green Belt and is likely to have limited impact on landscape designations. Development could have regeneration benefits for existing communities. This area did not score well in terms of accessibility, impact on prime agricultural land and capacity for future strategic development. There is also a significant level of existing allocations, particularly at the Levenmouth strategic land allocation.	
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
NO	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
NO	

Table 8.14

Strategic Assessment Area	M9 Corridor
Reference Number	6
<b>Description of Area</b>	
The principal settlements are Linlithgow and Winchburgh. The M9 motorway, Edinburgh to Glasgow rail line (station at Linlithgow) and Union Canal pass through the area.	
The area is predominantly rural in character, much of which is of high landscape (Areas of Great Landscape Value at Bathgate Hills, River Avon Valley, Forth Shore and Airgarth Hills) and prime agricultural quality. The area around Bridgend, Philipstoun and Winchburgh contains evidence of previous mining activity largely associated with shale mining. The Firth of Forth coast also includes a Special Protection Area (SPA) and Ramsar site.	
Significant amount of land already allocated for development at Winchburgh (around 3,500 houses).	
Improvement works associated with the Forth Replacement Crossing have increased accessibility in the area. The proposed new junction at Winchburgh and the rail station will further improve accessibility. However, Transport Scotland may have concerns over the cumulative impact of development on the M8 / M9 and Newbridge roundabout presents a constraint.	
<b>Overall Assessment</b>	
The M9 Corridor area has excellent accessibility to employment and potentially has capacity for further strategic development. Loss of prime quality agricultural land and impact on landscape designations are potential concerns to be taken into account at Local Development Plan stage.	
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
YES	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
YES	

## 8 Appendices

Table 8.15

<b>Strategic Assessment Area</b>	<b>west West Lothian</b>
<b>Reference Number</b>	<b>7</b>
<b>Description of Area</b>	<p>The principal settlements are Armadale, Bathgate and Whitburn with a number of other villages located mainly to the south. A number of principal roads pass through the area and also the Airdrie to Bathgate and Edinburgh to Glasgow (via Shotts) rail lines. There are railway stations at Armadale, Bathgate, Blackridge, Addiewell, Breich and Fauldhouse.</p> <p>The area includes 2 AGLVs (the Bathgate Hills AGLV and Blackridge Heights), each of different landscape character and Areas of Special Landscape Control. It also includes Blawhorn Moss, Blackridge, a Special Area of Conservation (SAC) located within a Site of Special Scientific Interest (SSSI) which is one of the larger, least disturbed active raised bogs in the central belt of Scotland.</p> <p>Significant amounts of development land already allocated (sites for over 8,500 houses).</p>
<b>Overall Assessment</b>	<p>Good level of accessibility in regional terms. May have capacity for further strategic development, however, Transport Scotland may have concerns over the cumulative impact of development on the M8 and Newbridge roundabout presents a constraint.</p> <p>Development could bring regeneration benefits for existing communities but potential impact on landscape designations and prime quality agricultural land.</p>
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
YES	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
YES	

Table 8.16

<b>Strategic Assessment Area</b>	<b>M8 Corridor</b>
<b>Reference Number</b>	8
<b>Description of Area</b>	<p>The area is largely urbanised along the M8 corridor with the southern area being more rural. The main settlements are Livingston (the largest settlement and retail / administrative centre), Broxburn, Dechmont, East Calder, Kirknewton, Mid Calder, Polbeth, Pumpherston and Uphall / Uphall Station.</p> <p>The M8, A71 and A89 form the main road corridors and there are two rail lines - Edinburgh to Glasgow (via Shotts) line and Airdrie to Bathgate line. There are two railway stations at Livingston and others at Kirknewton and Uphall Station.</p> <p>The area to the east of the corridor is characterised by low lying and open fields much of which is prime quality agricultural land. Evidence of past industrial activity associated with the shale mining industry remains. The area includes Areas of Great Landscape Value at Almond and Linhouse Valley and Areas of Special Landscape Control.</p> <p>Significant amounts of development land already allocated (land for over 10,000 houses).</p>
<b>Overall Assessment</b>	<p>Good accessibility and potentially capacity for further strategic allocations however, Transport Scotland may have concerns over the cumulative effect of development on the M8. This area scored relatively well in terms of the other assessment criteria.</p> <p>More detailed assessment of impact on landscape designations and prime agricultural land can be undertaken through Local Development Plans.</p>
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
YES	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	

8 Appendices

<b>Strategic Assessment Area</b>	<b>M8 Corridor</b>
<b>Reference Number</b>	<b>8</b>
YES	
<b>Table 8.17</b>	
<b>Strategic Assessment Area</b>	<b>North West Edinburgh</b>
<b>Reference Number</b>	<b>9</b>
<b>Description of Area</b>	
<p>This area includes Queensferry and Kirkliston and is bounded to the north by the Firth of Forth. A number of main roads pass through it, the M9 and A90 connecting to the existing Forth Road Bridge and proposed Forth Replacement Crossing. There is a train station on the eastern edge of Queensferry. Much of the rural part of this area is of high agricultural and landscape value.</p> <p>Existing allocations for just under 1500 houses.</p>	
<b>Overall Assessment</b>	
<p>This area has excellent accessibility to employment and also scored well in terms of accessibility to retail and hospital facilities. It may have potential to accommodate further strategic development. However, much of the area is Green Belt, of high landscape value and is prime agricultural land.</p>	
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
NO	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
YES	

Table 8.18

<b>Strategic Assessment Area</b>	<b>West Edinburgh</b>
<b>Reference Number</b>	<b>10</b>
<b>Description of Area</b>	<p>This area stretches from Edinburgh Park/South Gyle within the built up area westwards along the A8 corridor to Newbridge. It also includes Ratho Station and the airport, existing and future Royal Highland Centre and proposed International Business Gateway. This is an area of national economic importance. The area is bound to the south by the railway line. It includes existing rail stations at Edinburgh Park and South Gyle, a Park and Ride facility at Ingliston, the proposed tram line to the airport and proposed Gogar Station which will provide a rail tram interchange. The A8 and the M9 are the main roads in West Edinburgh. The area includes land of prime agricultural value</p>
<b>Overall Assessment</b>	<p>West Edinburgh is ranked the most accessible in the SESplan area in terms of the employment indicator and 2<sup>nd</sup> for accessibility to retail. It also has good accessibility to hospital facilities. There is capacity for strategic development on land close to proposed business development and tram and rail services. Work has already been undertaken on transport and other infrastructure requirements through the West Edinburgh Development Partnership. Development may impact on prime agricultural land, Green Belt and landscape designations.</p>
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	YES
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	YES

## 8 Appendices

Table 8.19

Strategic Assessment Area	South West Edinburgh
<b>Reference Number</b>	11
<b>Description of Area</b>	
<p>This area lies between the Edinburgh - Glasgow railway line to the north and the Pentland Hills to the south. The main settlements are Ratho, Juniper Green, Currie and Balerno. The M8, A71 and A70 roads pass through the area and there is a Park and Ride at Hermiston. The area has one train station at Curriehill on the Edinburgh to Glasgow Central Line – this currently provides an hourly service.</p> <p>The area includes Heriot-Watt University and adjacent research park.</p>	
<b>Overall Assessment</b>	
<p>This area has potential to accommodate development on a strategic scale. It has good regional accessibility to employment (5<sup>th</sup> overall) but this is the lowest score of the areas around Edinburgh. Accessibility to retail and hospital facilities is relatively poor in comparison to other areas around Edinburgh. The area includes significant coverage of landscape designations and prime agricultural land. Development could also potentially have a detrimental impact on the Green Belt.</p>	
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
NO	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
YES	

Table 8.20

<b>Strategic Assessment Area</b>	<b>South Edinburgh</b>
<b>Reference Number</b>	<b>12</b>
<b>Description of Area</b>	This area forms an arc around the south of the city from the main railway line in the west to the Braid Hills in the east. The City Bypass forms the southern boundary. It is part of the built up area of the city and is of predominantly residential character. The Edinburgh – Glasgow Central line runs through the area with stations at Slateford, Kingsknowe and Wester Hailes. There is limited land available to accommodate strategic growth.
<b>Overall Assessment</b>	Whilst this area has relatively good access to bus and train services, it has limited capacity for strategic development. No major brownfield redevelopment opportunities and the majority of greenfield sites are covered by landscape designations.
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	NO
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	NO

Table 8.21

<b>Strategic Assessment Area</b>	<b>South East Edinburgh</b>
<b>Reference Number</b>	<b>13</b>
<b>Description of Area</b>	



8 Appendices

<b>Strategic Assessment Area</b>	<b>South East Edinburgh</b>
<b>Reference Number</b>	<b>13</b>
<p>South East Edinburgh stretches from the Braid Hills in the west to Newcraighall and the A1 road in the east. It covers land in the City of Edinburgh, Midlothian and a small part of East Lothian. Part of the area is built up of mainly residential character. It includes the area of the South East Wedge, an existing strategic proposal for up to 4000 houses and supporting services and major business development including a Bioquarter next to the new Edinburgh Royal Infirmary and the new Shawfair Business Park. There are 2 rail stations in the area at Brunstane and Newcraighall, a proposed new station at Shawfair on the Borders Rail Line and a bus based park and ride facility at Sheriffhall. The proposed (but not yet committed) south east tram line passes through the area.</p>	
<b>Overall Assessment</b>	
<p>This area provides an opportunity for strategic housing development, building upon the planned Shawfair new community, in a location with excellent accessibility to existing and proposed jobs and the potential to deliver regeneration benefits. The area also has excellent accessibility to retail and hospital facilities (ranked 1st overall). Development will require loss of Green Belt land but there should be potential to avoid the most valuable areas. Development will also impact on prime agricultural land and may affect landscape designations.</p>	
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
YES	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
YES	
<b>Table 8.22</b>	
<b>Strategic Assessment Area</b>	<b>Central Edinburgh</b>
<b>Reference Number</b>	<b>14</b>
<b>Description of Area</b>	

<b>Strategic Assessment Area</b>	<b>Central Edinburgh</b>
<b>Reference Number</b>	<b>14</b>
<p>This area includes Edinburgh City Centre with its regional shopping facilities, entertainment and cultural attractions, offices and Edinburgh University. It has two railway stations at Waverley and Haymarket, St Andrews Bus Station and will be served by the proposed tram. Holyrood Park incorporating Salisbury Crags and Arthur's Seat is located in this area. Existing redevelopment proposals including Fountainbridge and Quatermile could provide over 4000 new homes.</p>	
<b>Overall Assessment</b>	
<p>There are significant existing businesses and housing allocations in Central Edinburgh. The area scores well in terms of accessibility and impact on prime agricultural land. But it has little capacity for planned strategic growth because of limited land availability. Almost all greenfield land in this area is covered by landscape and Green Belt designations or is valuable open space. Redevelopment opportunities may emerge through the plan period as "windfall sites".</p>	
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
NO	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
NO	

**Table 8.23**

<b>Strategic Assessment Area</b>	<b>North East Edinburgh</b>
<b>Reference Number</b>	<b>15</b>
<b>Description of Area</b>	
<p>North East Edinburgh stretches from Portobello in the east to Leith Walk in the west. It lies wholly within the built up area of the City. Existing redevelopment proposals could provide around 1000 homes.</p>	

8 Appendices

<b>Strategic Assessment Area</b>	<b>North East Edinburgh</b>
<b>Reference Number</b>	<b>15</b>
<b>Overall Assessment</b>	Development in this area would have no impact on the Green Belt, landscape designations or prime agricultural land and would bring regeneration benefits. It has good accessibility, and no major infrastructure difficulties. But there is no capacity for strategic development.
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	NO
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	NO

Table 8.24

<b>Strategic Assessment Area</b>	<b>Edinburgh Waterfront</b>
<b>Reference Number</b>	<b>16</b>
<b>Description of Area</b>	Land at Granton and Leith Waterfront is earmarked for major redevelopment incorporating housing, business and other related uses. This is a significant long term regeneration opportunity. Land already identified in the Edinburgh City Local Plan could provide 28000 new homes. In time, this area will be served by the tram.
<b>Overall Assessment</b>	

## Appendices 8

<b>Strategic Assessment Area</b>	<b>Edinburgh Waterfront</b>
<b>Reference Number</b>	<b>16</b>
Development in this area would have no impact on the Green Belt, landscape designations or prime agricultural land and would bring regeneration benefits. It has good accessibility, particularly when the tram proposal is implemented. Work is ongoing on delivery of infrastructure. But for this SDP period, there is no capacity for strategic development over and above what is already allocated.	
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
NO	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
NO	

Table 8.25

<b>Strategic Assessment Area</b>	<b>North Edinburgh</b>
<b>Reference Number</b>	<b>17</b>
<b>Description of Area</b>	
North Edinburgh covers the area from Leith Walk in the east to Cramond and Corstorphine in the west. It is part of the built up area of the city and is of predominantly residential character. There are a number of developments currently under construction in this area and existing development proposals.	
<b>Overall Assessment</b>	
North Edinburgh has little capacity for planned development on strategic scale. Existing greenfield land is either Green Belt and/or open space. On a strategic level, the area has good accessibility and development would have little impact on landscape designations and prime agricultural land.	

## 8 Appendices

<b>Strategic Assessment Area</b>	North Edinburgh
<b>Reference Number</b>	17
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
NO	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
NO	

Table 8.26

<b>Strategic Assessment Area</b>	A7 / A68 / Borders Rail Corridor
<b>Reference Number</b>	18
<b>Description of Area</b>	<p>Area immediately south of A720 City Bypass with the A7 and A68 forming the main road transport routes. Will be served by Borders rail (expected opening 2014), with stations at Eskbank, Newtongrange and Gorebridge. The A68 Bypass (of Dalkeith) was opened in 2008.</p> <p>Includes the following main settlements: Dalkeith / Eskbank, Newtongrange, Mayfield / Easthouses, Gorebridge, Bonnyrigg and Rosewell. Significant amounts of development land already allocated (land for over 5,000 houses) including new settlement at Redheugh. Concerns regarding coalescence, settlement identity and community cohesion.</p> <p>Deeply incised valleys make links across the area difficult. Areas to the east at higher altitude, steeply sloping and northerly aspect – implications for sustainable development. Includes Green Belt, AGLV and designed landscapes and protected river valleys. Poor ground conditions and undermining may be an issue.</p>
<b>Overall Assessment</b>	

## Appendices 8

<b>Strategic Assessment Area</b>	<b>A7 / A68 / Borders Rail Corridor</b>
<b>Reference Number</b>	<b>18</b>
An area with reasonable accessibility to employment and hospital facilities and good accessibility to retail facilities. The future implementation of the Borders Rail proposal will enhance public transport services in this area. There is some capacity for further strategic development in addition to that already allocated. However, this may impact on the Green Belt, landscape designations and prime agricultural land.	
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
YES	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
YES	

Table 8.27

<b>Strategic Assessment Area</b>	<b>A701 Corridor</b>
<b>Reference Number</b>	<b>19</b>
<b>Description of Area</b>	
Area immediately south of A720 City Bypass with the A701 forming the main road transport route to Edinburgh. No rail services and area south of Penicuik is less well served by public transport. Two main settlements (Loanhead and Penicuik) and also smaller communities. Two key locations for the biotechnology and knowledge sector at the Bush / Edinburgh Technopole and at Roslin Institute.	
Deeply incised valleys make links across to the east of the district difficult. Some areas to the west, are at higher altitude and relatively steeply sloping - implications for sustainable development. Poor ground conditions and undermining may be an issue.	
Includes Green Belt, AGLV, designed landscapes and protected river valleys. Potential historic battlefield site at Roslin. There are already allocations for over 1,500 houses in this area.	

## 8 Appendices

<b>Strategic Assessment Area</b>	<b>A701 Corridor</b>
<b>Reference Number</b>	<b>19</b>
<b>Overall Assessment</b>	There is capacity for some additional strategic housing development in this area. Overall the area scored reasonably well in terms of the three regional accessibility indicators. Impact on the Green Belt and landscape designations, accessibility and topography are issues in some locations but these can be taken into account in identifying sites at Local Development Plan stage.
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
YES	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
YES	

Table 8.28

<b>Strategic Assessment Area</b>	<b>Rural South Lothian Area</b>
<b>Reference Number</b>	<b>20</b>
<b>Description of Area</b>	This area straddles the local authority areas of East Lothian and Midlothian. It is typified by its more rural characteristics and principally agricultural land. The only significant settlements are Pencailand and Ormiston. There are also a number of smaller communities. The area is not generally well served by public transport. Parts of the area have a history linked with coal mining.
<b>Overall Assessment</b>	The most rural parts of Midlothian and East Lothian are not suitable for strategic levels of development. Whilst there is no Green Belt in this area, development is likely to impact on landscape designations and prime agricultural land. This area did not score well in terms of the regional accessibility indicators. It is not well served in terms of public transport and local infrastructure.

<b>Strategic Assessment Area</b>	<b>Rural South Lothian Area</b>
<b>Reference Number</b>	<b>20</b>
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
<b>NO</b>	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
<b>NO</b>	

**Table 8.29**

<b>Strategic Assessment Area</b>	<b>East Lothian West</b>
<b>Reference Number</b>	<b>21</b>
<b>Description of Area</b>	<p>An area of largely coastal settlements extending eastwards from Musselburgh, East Lothian's largest town. Inland, towns and villages such as Tranent and Wallyford are framed by Fa'side Hill and set in an agricultural landscape (prime quality) most of which is contained within the Edinburgh Green Belt. The area is bisected by the strategic transport routes of the A1 trunk road and the East Coast Main Line (ECML), with stations at Musselburgh, Wallyford, Prestonpans and Longniddry.</p> <p>Includes two sites in Historic Scotland's Historic Battlefields Inventory – Pinkie (Musselburgh/Wallyford) and Preston Pans.</p> <p>Queen Margaret University is located on the west side of Musselburgh, adjacent to substantial areas of undeveloped Class 4 employment land.</p> <p>Significant amounts of development land already allocated (land for over 5,000 houses), including proposed new settlement at Blindwells.</p>
<b>Overall Assessment</b>	



8 Appendices

<b>Strategic Assessment Area</b>	<b>East Lothian West</b>
<b>Reference Number</b>	<b>21</b>
This area is the most accessible in East Lothian, ranked 9 <sup>th</sup> overall in terms of accessibility to employment. The area has some capacity for additional strategic development. Loss of prime agricultural land, settlement coalescence and impact on Green Belt are potential concerns.	
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
YES	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
YES	

**Table 8.30**

<b>Strategic Assessment Area</b>	<b>East Lothian Central</b>
<b>Reference Number</b>	<b>22</b>
<b>Description of Area</b>	
Set within the Haddington Plain, this is an area of prime quality farmland for which Haddington has traditionally acted as the market town. Volcanic outcrops such as the Garlton Hills and Traprain Law punctuate the agricultural landscape. The area is bisected by the A1 trunk road while the East Coast Main Line runs through its northern part, with a station at Drem, from where a branch lines connects to North Berwick. The area contains a number of fine estates, some recognised as Designed Landscapes.	
There are already committed allocations for over 1,000 houses in this area.	
<b>Overall Assessment</b>	

## Appendices 8

<b>Strategic Assessment Area</b>	<b>East Lothian Central</b>
<b>Reference Number</b>	<b>22</b>
This area has reasonable accessibility to employment and contains no Green Belt. It has some capacity for further development to complement the current settlement strategy. Impact on prime agricultural land and landscape designations are potential considerations in site selection at LDP stage.	
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
YES	
<b>Recommended as Preferred Location for Development?</b>	
YES	

Table 8.31

<b>Strategic Assessment Area</b>	<b>East Lothian Coastal</b>
<b>Reference Number</b>	<b>23</b>
<b>Description of Area</b>	
This area is based on the coastal villages of Aberlady, Gullane, Dirleton and North Berwick, well-known tourist destinations. Whitekirk and Tynninghame occupy more inland locations. North Berwick Law punctuates an otherwise low-lying, productive agricultural landscape. North Berwick has a train service to Edinburgh via Drem.	
<b>Overall Assessment</b>	
The area is not suitable for strategic development taking account of accessibility and also development and infrastructure capacity and impact on landscape designations.	
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
NO	

8 Appendices

<b>Strategic Assessment Area</b>	<b>East Lothian Coastal</b>
<b>Reference Number</b>	<b>23</b>
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
<b>NO</b>	

**Table 8.32**

<b>Strategic Assessment Area</b>	<b>East Lothian East</b>
<b>Reference Number</b>	<b>24</b>
<b>Description of Area</b>	<p>A coastal area extending into the eastern foothills of the Lammermuirs with Dunbar its main settlement, to which Belhaven and West Barns are closely linked. Inland, within the more undulating foothills area, are the villages of Innerwick and Oldhamstocks. Dunbar itself, has been the subject of substantial regeneration initiatives. The nearby Torness nuclear power station and the La Farge cement works and limestone quarry have substantial physical presence and are a source of local employment. Nearby Oxwellmains has a substantial landfill site.</p> <p>With a station on the East Coast Mainline and direct links onto the A1 Expressway, Dunbar has attracted substantial housing development in recent years.</p> <p>Includes a site in Historic Scotland's Historic Battlefields Inventory south of Dunbar.</p>
<b>Overall Assessment</b>	<p>This area has reasonable accessibility to employment and some limited potential for future strategic development to complement the current settlement strategy. There is no Green Belt but impact on landscape designations and prime agricultural land and historic battlefields should be taken into account.</p>
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	

<b>Strategic Assessment Area</b>	<b>East Lothian East</b>
<b>Reference Number</b>	<b>24</b>
YES	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
YES	

**Table 8.33**

<b>Strategic Assessment Area</b>	<b>Eastern Borders</b>
<b>Reference Number</b>	<b>25</b>
<b>Description of Area</b>	
<p>The main settlements in this area are Eyemouth, Duns and Chirnside. The area benefits from good north-south transport links by road (A1). The East Coast main line passes through the area but the closest station is Berwick-Upon-Tweed. The Edinburgh-Berwick-Upon-Tweed Local Rail Study, which was finalised in June 2013, has highlighted the potential for new station facilities at Reston.</p> <p>The landscape surrounding Eyemouth is of undulating landform and relatively low relief. The coastal edge is farmed and open. Inland there are woodlands which have gained stature and visual prominence. To the west, Duns lies at the foot of the Lammermuir Hill and on the edge of the broad farmed lowlands of the Blackadder Water Valley which form part of the lower Tweed basin. The surrounding landscape comprises prime quality farmland.</p> <p>The eastern coastline is designated as a Special Landscape Area. The existing Scottish Borders Structure Plan identifies this area as the Eastern Hub and requires land allocations for over 1,600 houses.</p>	
<b>Overall Assessment</b>	

8 Appendices

<b>Strategic Assessment Area</b>	<b>Eastern Borders</b>
<b>Reference Number</b>	<b>25</b>
<p>There is capacity for further development in this area in addition to that already proposed in the approved development plan. There is no Green Belt and development is unlikely to have a significant impact on areas of landscape quality. Loss of prime agricultural land is an issue. There is potential in the longer term to improve public transport accessibility with a new station at Reston. In terms of the local accessibility indicators, this area scored highest of the whole SESplan area.</p> <p>The Consolidated Local Plan identifies significant capacity for housing, and potential longer-term housing areas are also identified in, Duns and Reston. In addition, there are further proposals identified as part of the MIR. Housing completions within the Scottish Borders have continually declined over this last four years from 659 completions in 2007 / 2008 Housing Land Audit to 266 in the 2011 / 2012 Housing Land Audit. For that reason there is very limited scope for further allowances to be made in view of marketability factors.</p>	
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
YES	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
YES	
<b>Table 8.34</b>	
<b>Strategic Assessment Area</b>	<b>Lauder / Coldstream Area</b>
<b>Reference Number</b>	<b>26</b>
<b>Description of Area</b>	
<p>The main settlements are Lauder, Coldstream and Greenlaw. Both the A68 and A697 trunk roads run through the area. No existing rail services but the proposed Waverley Railway Line passes through Stow. An allocation has been made for a railway station and associated car parking.</p>	

## Appendices 8

<b>Strategic Assessment Area</b>	<b>Lauder / Coldstream Area</b>
<b>Reference Number</b>	<b>26</b>
<p>-</p> <p>To the east of the area, Coldstream is located on the northern banks of the River Tweed, which forms the border with England. The core of the town is sited on an elevated terrace of land abutting the rivers and raised above the flat haughlands that lie within a tight meander of the Tweed. The surrounding landscape of Berwickshire composes rich, rolling farmland. To the west, Lauder is located on the west side of the valley of the Leader Water and sits on an elevated ledge above a lower lying plain. The surrounding landscape is characterised by the well defined valley framed by steep slopes which rise up to low hills on either side. The valley floor is relatively wide and open allowing long views along the valley length.</p> <p>The Lammermuir Hills Special Landscape Area is bounded on its western edge by the A68 and the A697 to where the Southern Upland Way crosses east to west. This area is not identified as a development hub in the existing Borders Structure Plan.</p>	
<b>Overall Assessment</b>	
<p>There are potential infrastructure and development capacity constraints in this area. In addition the topography of the area and accessibility considerations suggest that it is not suitable as a location for strategic growth. There is potential in the longer term to improve public transport accessibility in the west through the new station at Stow.</p> <p>The Consolidated Local Plan identifies significant capacity for housing, and potential longer-term housing areas are also identified in, Coldstream and Greenlaw. Housing completions within the Scottish Borders have continually declined over this last four years from 659 completions in 2007 / 2008 Housing Land Audit to 266 in the 2011 / 2012 Housing Land Audit. For that reason there is very limited scope for further allowances to be made in view of marketability factors.</p>	
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
NO	

8 Appendices

<b>Strategic Assessment Area</b>	<b>Lauder / Coldstream Area</b>
<b>Reference Number</b>	<b>26</b>
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
NO	

**Table 8.35**

<b>Strategic Assessment Area</b>	<b>Central Borders</b>
<b>Reference Number</b>	<b>27</b>
<b>Description of Area</b>	
<p>This area includes Galashiels, Hawick, Kelso, Melrose and Selkirk. The main roads through this area are the A7, A68, A72 and the A698. Land at Selkirk has been safeguarded for a town by-pass; longer term development in the settlement is dependent on this. However there is currently no Scottish Government commitment. The route of the proposed Borders Railway Line passes through this area. Sites for railway stations and associated car parking are identified in Galashiels and Tweedbank.</p> <p>The topography of Galashiels, together with road capacity constraints pose a significant challenge for future growth; there are also local network issues in Jedburgh. Major settlement expansion is planned for Newtown St Boswells; sites for this have now been allocated. The Countryside Around Towns policy covers much of the area between Galashiels and St Boswells to prevent coalescence of individual towns and villages within the area.</p> <p>The area includes the Eildon Hills National Scenic Area and three Special Landscape Areas, the Tweed Lowlands, Teviot Valleys and the Tweed, Ettrick and Yarrow Confluences.</p> <p>The existing Scottish Borders Structure Plan identifies this area as the Central Hub and requires land allocations for over 5,000 houses.</p>	
<b>Overall Assessment</b>	

<b>Strategic Assessment Area</b>	<b>Central Borders</b>
<b>Reference Number</b>	<b>27</b>
<p>This area includes the largest settlements in the Borders and the greatest concentration of local services and facilities. There is capacity for further development in this area in addition to that already proposed in the approved development plan. Consideration needs to be given to the potential impact of development on built and natural heritage resources in the area. This area is one of the most accessible in relation to local services and facilities.</p> <p>The Consolidated Local Plan identifies significant capacity for housing, and potential longer-term housing areas are also identified in, Kelso, Earlston, Hawick and Galashiels. In addition, there are further proposals identified as part of the MIR. Housing completions within the Scottish Borders have continually declined over this last four years from 659 completions in 2007 / 2008 Housing Land Audit to 266 in the 2011 / 2012 Housing Land Audit. For that reason there is very limited scope for further allowances to be made in view of marketability factors.</p>	
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
YES	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
YES	
<b>Table 8.36</b>	
<b>Strategic Assessment Area</b>	<b>South Borders</b>
<b>Reference Number</b>	<b>28</b>
<b>Description of Area</b>	
<p>This area is of rural character, the main settlement is Newcastleton. It is relatively remote from other settlements in the Borders; it is connected to Hawick by the B6357 and B6399. To the south, the B6357 joins the A7 near Canonbie. The Council wishes to see the extension of the Waverley Line to Carlisle. Improving transport links is a key issue in this area.</p>	



## 8 Appendices

<b>Strategic Assessment Area</b>	<b>South Borders</b>
<b>Reference Number</b>	28
<p>Newcastleton is situated in the upland valley with pastoral floor of the Liddel Water. It has significant flooding and drainage constraints.</p> <p>The South Borders area includes part of the Tweed, Ettrick and Yarrow Confluences Special Landscape Area and the Cheviot Foothills Special Landscape Area as well as the Bowhill Garden and Designed Landscape.</p>	
<b>Overall Assessment</b>	
<p>This area is the most rural and remote in the Borders. It does not have capacity for strategic growth.</p> <p>The Consolidated Local Plan identifies capacity for housing within the South Borders. Housing completions within the Scottish Borders have continually declined over this last four years from 659 completions in 2007 / 2008 Housing Land Audit to 266 in the 2011 / 2012 Housing Land Audit. For that reason there is very limited scope for further allowances to be made in view of marketability factors and in view of the relative remoteness and the absence of any major settlements in the area where few development proposals are appropriate.</p>	
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
NO	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
NO	

Table 8.37

Strategic Assessment Area	Western Borders
<b>Reference Number</b>	29
<b>Description of Area</b>	
<p>The main settlements are Peebles and Innerleithen. The A72 from Galashiels to Hamilton, South Lanarkshire passes through both Innerleithen and Peebles. There is reasonable proximity to Edinburgh on the A703. There are no rail links within this area.</p> <p>Peebles benefits from a dramatic setting at the convergence to the River Tweed and the Eddleston Water with high hills on all sides. The northern portion of the town nestles into the slopes of Venlaw Hill and onto flatter land to the west of the Eddleston Water. The southern portion of Peebles over the Tweed lies within the flatter haughland of the river valley and on the lower slopes of the Cademuir Hill.</p> <p>Innerleithen sits on a significant bend in the River Tweed at a point where the valley floor opens out into wide haughland. The area includes the River Tweed which is a Special Area of Conservation and the Tweed Valley Special Landscape Area.</p> <p>The existing Scottish Borders Structure Plan identifies this area as the Western Hub and requires land allocations for over 1,500 houses.</p>	
<b>Overall Assessment</b>	
<p>There is capacity for further development in this area in addition to that already proposed in the approved development plan. Development would have no impact on Green Belt or prime agricultural land. The area has good links to the Edinburgh area and acts as a sub-regional area for local services and facilities.</p>	

8 Appendices

<b>Strategic Assessment Area</b>	<b>Western Borders</b>
<b>Reference Number</b>	<b>29</b>
<p>The Consolidated Local Plan identifies significant capacity for housing, and potential longer-term housing areas are also identified in Peebles and Innerleithen. In addition, there are further proposals identified as part of the MIR. Housing completions within the Scottish Borders have continually declined over this last four years from 659 completions in 2007 / 2008 Housing Land Audit to 266 in the 2011 / 2012 Housing Land Audit. For that reason there is very limited scope for further allowances to be made in view of marketability factors.</p>	
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
YES	
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
YES	

**Table 8.38**

<b>Strategic Assessment Area</b>	<b>West Linton Area</b>
<b>Reference Number</b>	<b>30</b>
<b>Description of Area</b>	
<p>The main settlement is West Linton which is located on the A702 which links the A74(M) to the Edinburgh City Bypass A720. There are no rail links within this area.</p> <p>-</p> <p>West Linton is clustered around the valley and gorge occupied by the Lyne Water, where it exits the foothills of the Pentland Hills. Part of this area is identified as the Pentlands Special Landscape Area.</p>	

## Appendices 8

<b>Strategic Assessment Area</b>	<b>West Linton Area</b>
<b>Reference Number</b>	<b>30</b>
<b>Overall Assessment</b>	<p>West Linton has been subject to significant growth in the past decade. With no rail link and its proximity to Edinburgh, further strategic allocations in this area would encourage car based commuting. This would be contrary to sustainable development objectives. This area scored less well than other Borders areas in terms of the local accessibility indicator.</p> <p>The Consolidated Local Plan identifies significant capacity for housing. Housing completions within the Scottish Borders have continually declined over this last four years from 659 completions in 2007 / 2008 Housing Land Audit to 266 in the 2011 / 2012 Housing Land Audit. For that reason there is very limited scope for further allowances to be made in view of marketability factors.</p>
<b>Recommended as Preferred Location for Development in Original Assessment?</b>	
	NO
<b>Recommended as Preferred Location for Development in Updated Assessment?</b>	
	NO

