

## **Edinburgh Local Development Plan Proposed Plan**

### **Report by Ian Johnson, Head of Planning and Development**

#### **1 Purpose of Report**

- 1.1** The City of Edinburgh Council (CEC) has published its Proposed Edinburgh Local Development Plan (ELDP) and made it available for inspection from 1 May - 14 June 2013. Formal representations can be made on the Proposed Plan. The Plan is accompanied by a revised Environmental Report, a Proposed Action Programme and supporting documents, and written comments can also be submitted on these. This report identifies those aspects of the Plan with potential implications for Midlothian and seeks approval to submit comments and/or representations accordingly.

#### **2 Background**

- 2.1** The City of Edinburgh and Midlothian Councils are partner authorities, along with East Lothian, Fife, Scottish Borders and West Lothian Councils, in SESplan, the Strategic Development Planning Authority for South East Scotland. The preparation of Local Development Plans is a requirement of each of these councils, as the means of delivering the strategy and policies of the Strategic Development Plan.
- 2.2** Both as a SESplan Member Council, and as an adjoining local authority, this Council has an interest in the Proposed ELDP. A copy of the document has been placed in the Members' library.
- 2.3** At its meeting on 10 January 2012, Cabinet considered the ELDP Main Issues Report and agreed to submit comments on its contents with respect to housing, economic growth, retailing, the Green Belt, green networks, affordable housing and transport. While many of these comments were supportive of the stance proposed by CEC, some asked for concerns to be addressed when preparing the Proposed ELDP. Section 3 below summarises CEC's response to these comments, as reflected in the Proposed ELDP; highlights changes introduced between the Main Issues Report and Proposed Plan stages that may have a bearing on Midlothian; and provides a suggested response to the Proposed ELDP for Members' consideration.
- 2.4** Where points of concern to this Council have not been addressed in the Proposed ELDP, these can be taken forward as representations to the Proposed Plan, if so desired. CEC has already acknowledged that it may need to prepare a Modified ELDP to take account of modifications to the SESplan Strategic Development Plan arising at the time of approval of the latter by Scottish Ministers (by August 2013). The recently published Report of the SESplan Examination (12 April 2013) is likely to have implications for the proposed ELDP as it currently stands.

### 3 Proposed ELDP: Matters of Interest

#### Housing

- 3.1** Response previously given by Midlothian Council to ELDP Main Issues Report (MIR): The ELDP MIR acknowledged the scale of housing required to be provided in Edinburgh to meet the SESplan Proposed Plan requirements (3,000 units in the 2009-24 period). It also noted that a further 24,000 houses approximately may be required across the SESplan area in the period 2024-32. CEC was asked to take full account of the cumulative impact of the SESplan requirements, most especially in respect of transport and congestion. This should include recognition of the SESplan Action Programme including the upgrading of Sheriffhall Roundabout and other A720 junctions, and implementation of the Orbital Bus Route, as required infrastructure improvements, with CEC as one of the partners responsible for delivering these projects (Actions 50, 51, 94, 96).
- 3.2** The ELDP MIR identified development land at Burdiehouse (east of Burdiehouse Road). CEC was advised that development here would impact on the A701/ A720 Straiton junction and solutions to the junction capacity problems would need to be considered in association with development in the A701 Corridor in Midlothian. Land to the west of Burdiehouse Road was not included in the preferred strategy. The MIR included a group of housing sites at Gilmerton and The Drum. CEC was advised that these were likely to have an impact on the Gilmerton junction on the A720 City Bypass and, should congestion result, this may extend into Midlothian at the A7/ Gilmerton Road junction (by Dobbies). The impact of this would need to be considered, along with traffic solutions, given the increasing congestion on the A7 on its approach to Sheriffhall Roundabout.
- 3.3** Proposed ELDP approach: The Proposed ELDP identifies a suite of housing sites in both West and South East Edinburgh to meet the SESplan strategic housing requirement. The sites in South East Edinburgh have a combined capacity of 1625-2275 houses and are of most interest in respect of their potential impact on Midlothian. This includes additional sites west of Burdiehouse Road at Broomhills (425-595 houses) and west of Old Dalkeith Road at Moredunvale Road (50 houses), neither of which were included in the MIR preferred strategy.
- 3.4** The Proposed ELDP states that all proposals will be required to make appropriate contributions to new/ improved infrastructure as specified in the Action Programme. Transport interventions necessary to mitigate the impacts of new housing proposals in South East Edinburgh have been identified through a transport appraisal and transport assessments will be required at the planning application stage. However, the transport appraisal concludes that, for the majority of the routes and individual roads, the estimated impact of the development sites, over and above the effect of committed development sites and background traffic growth, would equate to less than a 5% increase. However, a significant increase was forecast at:
- A701 Liberton Road +13.1%
  - A722 Gilmerton Road +23.3%

- 3.5** The transport appraisal identifies factors which might reduce this impact, such as slower build out, use of different routes, routes not affected for their entire length, and city-wide transport interventions, but concludes that new sites will exacerbate existing conditions, tending to extend peak periods and increase journey times. It concludes that new development sites will, in general, have minimal impact on cross-boundary travel. Midlothian is nevertheless ranked second highest out of eight local authorities (after West Lothian) in terms of the number of daily trips from Edinburgh into surrounding areas.
- 3.6** The impact of the allocated sites on the A720 City Bypass is found to be insignificant (cumulative impact of all 15 allocated sites being 3.1% morning increase and 2.8% evening increase). The appraisal suggests that no improvements to the City Bypass junctions are required in relation to the housing sites, noting that improvements are required to local junctions, public transport/ cycling and crossing facilities only. It notes that “further analysis of cumulative impacts will be required by other authorities as part of the process of preparing their own Local Development Plans”.
- 3.7** Suggested response to Proposed ELDP: Whilst this Council welcomes the provision made by CEC as a contribution to meeting the SESplan housing land requirements, it is concerned that the transport appraisal does not appear to take into account the full extent of committed development sites across local authority boundaries (Edinburgh/ Midlothian/ East Lothian/ Scottish Borders) and the impact that these, in conjunction with the new allocations, are likely to have on the strategic road network. It is considered that the appraisal is likely to underestimate traffic levels on these roads; increases in these traffic levels as a result of committed development may have implications for the potential requirements for improvements to junctions/ routes as a result of the new allocations.
- 3.8** Specifically, this Council is concerned about the potential impact of the proposed housing developments in South East Edinburgh on the junctions on the A720 City Bypass and key arterial routes into Edinburgh. This concern particularly relates to the A701/A720 Straiton junction and the consequent effect of congestion at the Gilmerton junction on the A720 and the potential for knock-on impacts from congestion here increasing traffic levels on the A7/Gilmerton Road junction (by Dobbies) and on the A7 approach to Sheriffhall Roundabout. This may require provision to be made through the ELDP and related Action Programme for these housing developments to contribute towards measures to address the increasing congestion on these junctions and the A7; this Council considers that developer contributions should not be restricted to improvements to the local road network only.
- 3.9** It is worth noting that, unlike development sites located in Midlothian, sites within the ELDP area are not required to contribute towards improvements to Sheriffhall Roundabout or the provision of Borders Rail line. These requirements are already burdensome for the sites located within this Council’s area.

- 3.10** The SESplan Action Programme (Action 94) identifies CEC as one of a number of 'responsible partners' for the delivery of the upgrading of Sheriffhall Roundabout and other junctions on the A720 City Bypass, including bus priority measures. Whilst the Proposed ELDP identifies the proposal to grade separate Sheriffhall Roundabout as a transport proposal/safeguard, and includes it within the Proposed Action Programme (Action T14), there is no similar safeguarding or commitment given to the upgrading of the A701/ A720 Straiton junction, the majority of which lies within CEC's boundary. Delivery of any improvements to this junction to accommodate growth in the A701 Corridor is dependent on such provision being made within the ELDP area. Transport Scotland has made it clear that this junction is of key concern to them with respect to any future development in this corridor. It is therefore unclear why substantial new housing sites at Burdiehouse and Broomhills are considered in the ELDP transport appraisal to have minimal effect on this junction.
- 3.11** The above concerns are underlined by the fact that the emerging National Planning Framework 3 (NPF3) does not identify the need for improvements to the A720 and its junctions as a national development. It states that, "Forward planning in SESplan and subsequent local development plans will need to take due account of potential impact on transport infrastructure, and address any capacity issues this raises" (NPF3 Main Issues Report and Draft Framework, paragraph 5.19).

#### Transport Infrastructure

- 3.12** Response previously given by Midlothian Council to ELDP Main Issues Report: This Council welcomed CEC's intention to safeguard the Orbital Bus Route.
- 3.13** Proposed ELDP approach: The Proposed ELDP presents a Transport Proposals and Safeguards table, including:
- T5 Orbital Bus Route (safeguard where route identified);
  - T14 Sheriffhall Junction Upgrade; and
  - T16 West of Fort Kinnaird to The Wisp.
- 3.14** Suggested response to Proposed ELDP: This Council welcomes the support for the interventions identified above. However, as outlined above (paragraphs 3.7 - 3.11), it is very concerned that there is no acknowledgement of the potential impact on the A720 Straiton or Gilmerton junctions of significant development areas identified at Broomhills, Burdiehouse, Gilmerton and The Drum. If the effects of committed development and new allocations across council boundaries were taken into account, the resulting impact is much more likely to be significant. Failing to address this could have a negative impact on Midlothian's ability to accommodate further development; this Council cannot be expected to resolve all the traffic issues on these A720 City Bypass junctions; it requires an appropriate cross-boundary approach involving the two Councils in liaison with Transport Scotland as trunk roads authority.

- 3.15** Furthermore, no recognition is given to the likely impact of development at Newcraighall (North and East - up to 600 houses) on the congested A720 Old Craighall junction. As with the A701/ A720 Straiton junction, the ELDP Proposed Action Programme does not commit CEC to contributing to the assessment and/or delivery of improvements to the Old Craighall junction, despite the allocation of a substantial amount of housing land at Newcraighall with potential to increase congestion at this location. Transport modelling undertaken in connection with the Midlothian Local Development Plan suggests that increasing congestion at Old Craighall is likely to result in traffic diverting to travel along the A6094 Salters Road and through Dalkeith town centre to reach Sheriffhall Roundabout.
- 3.16** CEC is asked to take full account of the recommendations of the Report of the SESplan Examination that SESplan Policy 8 be amended to state that Local Development Plans will “take account of the cross-boundary transport implications of all policies and proposals” (page 314, recommendation 5).
- 3.17** Finally, the SESplan Action Programme identifies CEC as one of the responsible partners for delivery of the Lothianburn Park and Ride and bus priority measures on the A7; these actions should be included in the ELDP Proposed Action Programme and acknowledged in the Proposed ELDP itself, given that their purpose is to reduce congestion on the road network within Edinburgh.

#### Additional Housing Land within Urban Areas

- 3.18** *Response previously given by Midlothian Council to ELDP Main Issues Report: The ELDP MIR proposed to identify new housing proposals which may not necessarily accord with SESplan policy; CEC was advised that there would generally be support for increasing the housing land supply in Edinburgh with the proviso that any impact on (transport) infrastructure was reflected in appropriate measures.*
- 3.19** *Proposed ELDP approach:* The Proposed ELDP includes a policy requirement that if, after two years following adoption, additional sites are needed to maintain a five-year effective housing land supply, CEC will prepare supplementary guidance to address this matter, indicating where and how additional effective sites within the urban area can be brought forward.
- 3.20** *Suggested response to Proposed ELDP:* The purpose of the ELDP policy - to provide a generous supply of housing land across a range of sites in the City - is welcomed. However, CEC is asked to consider whether this provision is sufficient to accommodate the additional housing land requirements likely to arise as a result of the recommendations in the Report of the SESplan Examination, currently being considered by Scottish Ministers. In this regard, the limitation of this policy stance to sites within the urban area may need to be reconsidered. If substantial additional housing land allocations are considered or required, then this Council would again ask that the transport implications are taken fully into account.

## Retailing

- 3.21** Response previously given by Midlothian Council to ELDP Main Issues Report: *The ELDP MIR sought to no longer apply a floorspace target for the City Centre with some support potentially given to growth in commercial centres, although the City Centre and town centres would remain the principal focus for new retail floorspace. This approach appeared to be a slight weakening in the policy to promote the City Centre. The ELDP MIR did not consider this would result in significant expansion of commercial centres, other than through existing consents, due to the current economic situation.*
- 3.22** Proposed ELDP approach: The Proposed ELDP states that prioritising the City Centre is a key objective, with CEC aiming to strengthen its shopping role within the region and attract more investment. There is a proposed policy change to allow uses other than shops in ground floor units in the retail core of the City Centre. Policies continue to direct new development to existing centres, with town centres being given priority over commercial centres; however, the Proposed ELDP states that policies relating to commercial centres may be revised in future plans.
- 3.23** It is noted that shopping proposals of a more local nature are identified in Table 8 in terms of the development of new retail units at Niddrie Mains Road, and new local centres at Granton Waterfront, Leith Waterfront and Fountainbridge. However, this table does not include the commercial/ retail opportunities provided for in conjunction with new residential development along Gilmerton Road and Burdiehouse Road (also at Newcraighall); indeed, the site briefs for these development areas do not provide any explanation of what is proposed at these locations in terms of scale or type of retail development (map reference only).
- 3.24** Suggested response to Proposed ELDP: This Council welcomes the ELDP retail policy position, and considers that the proposed policy change to allow uses other than shops in ground floor units in the retail core has the potential to strengthen the versatility and vibrancy of the City Centre to the benefit of its wider regional role.
- 3.25** This Council is concerned that the Proposed ELDP does not provide sufficient information about what is proposed in terms of 'retail opportunities' at Gilmerton and Broomhills/Burdiehouse development areas to allow proper consideration to be given to the potential transport or retail impacts of such development. This is of particular concern with respect to their potential impact at the Gilmerton and Straiton junctions on the A720 City Bypass, particularly in terms of cumulative impact in conjunction with the scale of residential growth in these areas, and proximity to retail centres in Midlothian.

## Green Belt and Green Network

- 3.26** Response previously given by Midlothian Council to ELDP Main Issues Report: *This Council would especially welcome the maintenance of the Green Belt and development of green networks at the Edmonstone ridge between Edinburgh and Midlothian (land to north west of Danderhall), given its importance to the landscape setting of both the City and Danderhall, and in avoiding settlement coalescence. Opportunities for cross-boundary green network opportunities and sustainable linkages between the two Council areas were expressly supported, as particularly beneficial for the communities of Danderhall, Millerhill and Shawfair.*
- 3.27** Proposed ELDP approach: The Edmonstone Ridge is proposed for retention within the Green Belt. An addition to the green network is proposed in the “South East Wedge parkland”. Potential access opportunities are also identified comprising a cycleway/ footway safeguard south of Burdiehouse and cycleway/ potential public transport safeguard on the former Loanhead to Danderhall railway line.
- 3.28** Suggested response to Proposed ELDP: This Council welcomes CEC’s intention to retain the Edmonstone ridge to the north west of Danderhall in the Green Belt, given its importance to the setting of the City and Danderhall. However, part of the Edmonstone Estate grounds now has the benefit of planning consent for residential development (originally for a care home and village and now, following a recent appeal decision, for housing). This potential change to the Green Belt in this vicinity will significantly reduce the extent of the Green Belt between the Edinburgh BioQuarter and Danderhall. For this reason, this Council stresses the importance of retaining the remainder of the Edmonstone Estate within the Green Belt, as a means to protect the setting, and also to reduce the likelihood of coalescence.
- 3.29** CEC’s proposed identification of the “South East Wedge parkland” as part of the green network is also welcomed, particularly the opportunities that this offers for promoting connections between Danderhall, Millerhill and Shawfair and the City. This Council is also supportive of the potential access opportunities identified in the Burdiehouse area, which can then link to Loanhead.

## **4 Report Implications**

### **4.1 Resource**

There are no resource implications arising directly from this report.

### **4.2 Risk**

By not taking the opportunity provided to respond to the Proposed ELDP, this Council would forfeit the opportunity to have its concerns considered by CEC or, if necessary, by the Reporter subsequently appointed to hold an Examination of unresolved issues. The outcome could have ramifications for the shared delivery of the SESplan Strategic Development Plan. Note that only those comments expressed as formal representations will be considered by the Reporter.

### **4.3 Single Midlothian Plan and Business Transformation**

Themes addressed in this report:

- ☒ Improving opportunities in Midlothian
- ☒ Sustainable growth

### **4.4 Impact on Performance and Outcomes**

This report pertains to a statutory development plan document prepared by another local authority. However, the outcome of the Council's deliberations on its implications could affect the achievement of service priorities related to preparing the Proposed Midlothian Local Development Plan by Spring 2014, and delivery of the requirements of the first SESplan Strategic Development Plan.

### **4.5 Adopting a Preventative Approach**

This report pertains to a statutory development plan document prepared by another local authority. However, concerns raised in this report as regards the adequacy of provision to address potential traffic congestion arising from the scale of development may have a bearing on the Action Programme for the Midlothian Local Development Plan.

### **4.6 Involving Communities and Other Stakeholders**

The ELDP MIR was subject to full consultation by CEC. The Proposed ELDP has been published for formal representations and CEC is conducting drop-in events to publicise it.

### **4.7 Ensuring Equalities**

An Equalities and Rights Impact Assessment has been prepared by CEC in support of the Proposed ELDP.

### **4.8 Supporting Sustainable Development**

The ELDP will help to implement the SESplan Strategic Development Plan which is based on the principles of a sustainable development strategy. It has been subject to Strategic Environmental Assessment and Habitats Regulations Appraisal (a revised Environmental Report and draft Habitats Regulations Appraisal accompany the document and are available on CEC's website).

### **4.9 IT Issues**

There are no IT issues arising from this report.

## **5 Recommendations**

### **5.1 The Committee is recommended to:**

- a) welcome the publication of the Proposed Edinburgh Local Development Plan by the City of Edinburgh Council, and the opportunity to submit comments and representations on its contents; and
- b) agree to submit, as a response to the City of Edinburgh Council, the following:
  - i) formal representations with respect to the transport-related concerns as expressed in paragraphs 3.7-3.11 and 3.14-3.17 of this report; and



- ii) comments on other matters as raised in paragraphs 3.20, 3.24-3.25, and 3.28-3.29 above, including those pertaining to the Proposed Action Programme.

**9 May 2013**

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**Background Papers:**

A copy of the Edinburgh Local Development Plan Proposed Plan LDP has been placed in the Members' library, together with a copy of the Transport Appraisal prepared by City of Edinburgh in support of the Proposed Plan.