

## Scottish Government Response to SESplan2 MIR – 29 September 2015

### Q1 The Vision

Do you support the preferred option, alternative options or none of the options?  
Please explain your answer. You may also suggest any changes.

A We support the explicit reference to town centres, within the SESplan Vision (Figure 1.2) as indicators of 'What Success Looks Like', and the vision for them to be vibrant with a mix of uses and an expanded evening economy – this is in line with SPP's Policy Principles. We welcome the particular reference to delivery of green networks in Strategic Development Areas as a measure of success – the SDP has an important supporting role to play in the proactive delivery of the Central Scotland Green Network national development.

### Q2 A Strategy for Edinburgh and South East Scotland

Do you support:

- Alternative option 1, concentrated growth (fig 2.2)
- Alternative option 2, distributed growth (fig 2.3)
- Preferred option 3, growth corridors (fig 2.4), or
- None of the options

Please explain your answer. You may also suggest any changes.

A SPP, paragraph 29, says that making decisions should be guided by the principle of making efficient use of existing capacities of land, buildings and infrastructure including supporting town centre and regeneration priorities. SPP also sets out a series of policy principles to guide the formation of development plans' spatial strategies, including using land within or adjacent to settlements for a mix of uses, which SPP notes will support the creation of more compact, higher density, accessible and more vibrant cores. The Preferred Option's approach of proposing strategic allocations close to Edinburgh's urban area along public transport corridors from strategic employment locations appears to support this approach.

### Q3 The Principles for Development

Do you support the principles for development?

Please explain your answer. You may also suggest any changes, including other principles for development.

A We would suggest amendments to 2 of the Principles for Development as shown below, to improve their alignment with Scottish Planning Policy (SPP).

- Optimise the use of existing transport networks and make new development accessible through a range of modes of transport that favours walking, cycling and public transport over private car use.
- Optimise and enhance the use of existing education, health and other infrastructure by taking a strategic design-led approach.

We welcome the principle of supporting town centres as the preferred location for uses generating high levels of foot fall – this supports and contributes to a Town Centres First Approach. The Town Centre First Principle<sup>1</sup> jointly developed by Scottish Government and COSLA encourages the public sector to continue to invest

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<sup>1</sup> Town Centre First Principle <http://www.scotland.gov.uk/Topics/Built-Environment/regeneration/town-centres/TheTownCentreFirstPrinciple>

## Scottish Government Response to SESplan2 MIR – 29 September 2015

in town centres and help communities thrive. The principle is about adopting an approach to decisions that considers the vibrancy of town centres as a starting point.

There is scope to strengthen the plan's commitment to green networks and highlight how development can contribute to its delivery. The principle 'Conserve and enhance the natural and built environment' could be supplemented to include reference to enhancing green networks, or the principle about making new development accessible through a range of sustainable modes could include reference to active travel through new and enhanced green networks. The SDPA may also wish to consider including an additional principle for development about considering green infrastructure as an integral element of places, in and around towns, and that development should safeguard and enhance the green network.

### Q4

Do you support the above approach to direct LDPs to deliver high quality places? Please explain your answer. You may also suggest any changes, including other factors to be considered.

**A** We would suggest amendments to 2 of the principles to be promoted through LDP policies and development management as shown below, to improve their alignment with Scottish Planning Policy (SPP).

- The shaping of development at an early stage through the use of development frameworks, design briefs or master plans that respond to how people use public spaces.
- Development which shows good practice in place making by demonstrating the six qualities of successful places (distinctive, safe and pleasant, welcoming, adaptable, resource efficient, easy to move around and beyond)

### Q5 **Locations of Significant Business Clusters**

Do you support the preferred option, alternative option or none of the options? Please explain your answer. You may also suggest any changes.

**A** We are supportive of the preferred option. In particular we note that the approach is not limited to the clusters identified in table 3.1 of the MIR and that the approach will reflect the differing nature of the economies of the city, towns and rural areas of the region. In this regard we are supportive of the narrative in paragraph 3.5 and the recognition that the region has strengths outwith the key growth sectors and that clusters will take different forms in the city, towns and rural area.

In relation to the point that the approach is not limited to the clusters identified in table 3.1 we wonder to what degree other potential strategic employment areas around the city region have been considered? Those that are more significant than small scale local employment sites, but are not significant enough to merit specific recognition in NPF3.

There are other strategic employment sites across the SESPlan area that it might be appropriate for the SDP to consider and provide commentary on, for example the Strategic Investment Zones in Fife (see [link](http://issuu.com/investinfife/docs/fife_property_prospectus)) [http://issuu.com/investinfife/docs/fife\\_property\\_prospectus](http://issuu.com/investinfife/docs/fife_property_prospectus) and/or major clusters in West Lothian, for example the Heartlands development at Whitburn, thus recognising

## Scottish Government Response to SESplan2 MIR – 29 September 2015

the appropriate references at page 14 of NPF3. The recent Scottish Government intervention in announced high profile closures at Longannet and Tullis Russell will also be of relevance, leaving potentially large areas of vacant employment sites, and the outcomes of the task forces may have some strategic relevance for the plan to consider and highlight.

Whilst we appreciate that such sites may not be of the same scale as those set out in table 3.1, they do appear to sit within or adjacent to large clusters of employment with some strategic function and may be appropriate for consideration in the SDP as identified in SPP para 98. The MIR states that SDP2 will be aligned with and support local economic strategies across the region, suggesting that sites should be considered. The legacy of ageing employment land across the region and the changing nature of our economy suggests that more historical industrial/business locations could be considered either for protection or highlighting a need for their regeneration or diversification. In accordance with paragraph 103 of the SPP it would be useful to understand whether there have been any issues in relation to the take up of allocated employment sites. Are any underused for example with the opportunity to reallocate for alternative uses? While this may not be a function of the SDP it would be useful to highlight this issue in the SDP and as a function of LDPs.

In relation to Cockenzie, table 3.1 addresses its development primarily from an energy perspective, this is compliant with the references in NPF3. However we note Scottish Power's recent announcement that it will abandon plans to build a new gas-fired power station at Cockenzie in East Lothian. Similarly with Longannet, consideration will now have to be given as to the future of the site and what uses will make best use of the locations assets. Development at Cockenzie should bring forward the qualities of sustainability and place making as outlined in the principal policies of SPP.

SPP sets out (paragraph 60) as a Policy Principle that the planning system should apply a town centre first policy when planning for uses which attract significant numbers of people, including offices. We would expect SDP2 to support the town centres first approach when planning for uses which attract significant numbers of people, within the context of a flexible, realistic approach to ensure that different uses are developed in the most appropriate locations.

### **Q6 The Visitor Economy**

Do you support the preferred option?

Please explain your answer. You may also suggest any changes.

- A** The preferred option under Issue D refers to opportunities shown on fig 3.1 for tourism and recreation development. Fig 3.1 only appears to show one tourism and recreation development opportunity, at Queensferry. This is despite discussion of the significant tourism and recreation offerings across SESPlan area in paragraphs 3.5 and 3.6 e.g. a strategic tourism cluster in the Tweed Valley and golf in East Lothian. We recommend that if fig 3.1 is to be included within the Proposed Plan, it be redrafted to include all potential locations for nationally and regionally important tourism and recreation developments. In addition the tourism and recreation cluster shown on fig 3.1 is not explained in the MIR and doesn't seem to follow from table 3. It would be useful for this to be explained.

## Scottish Government Response to SESplan2 MIR – 29 September 2015

We welcome the support for the enhancements to strategic active travel networks and the recognition of their value to add to the attractions of the region.

### **Q7 Wind Energy**

Do you support the emerging content of SDP2 relating to wind energy?

Please explain your answer. You may also suggest any changes.

Should SDP2 identify broad cross-boundary areas where cumulative impacts from wind turbines may happen?

- A** The approach proposed would appear to meet the requirements defined by SPP paragraph 162, however there is a need to ensure that the information presented does not unduly detract policy consideration against the wind farm spatial framework approach defined in Table 1 SPP. Figure 3.2 may provide an additional useful steer to the development industry, but we would note caution on the identification of wind turbine locations as this may change. In order to ensure full compliance with national policy reference should be made to the Scottish Government's Some Questions Answered - <http://scotgovplanningarchitecture.com/2014/12/05/onshore-wind-questions-answered/> and to the recently published SNH Guidance on spatial planning for onshore wind turbines - natural heritage considerations - <http://www.snh.gov.uk/docs/A1663759.pdf>

With reference to page 19 of the MIR, Fig 3.2: Energy Network, if this is to be reproduced in the Proposed Plan we suggest that the reference to the 'Offshore Wind Area of Search' is removed from the map and key, as it could be misleading given that it has been superseded.

In terms of paragraph 3.16, we would recommend that due reference is made to NPF3 page 39 (Cockenzie). This includes the need to ensure that developers work together to minimise the number and impacts of these developments by combining infrastructure where possible.

### **Q8 Resource Extraction**

Do you support the preferred option, alternative option or none of the options?

Please explain your answer. You may also suggest any changes.

- A** Where references to coal reserves are made in the Proposed Plan (as per paragraph 3.21 of the MIR), they could be strengthened by identifying for the reader whether the potential coal resource in the SESplan area could in land use terms be converted into workable reserves. There's a subtle difference. So the SDP should at least be changed from "there are extensive coal reserves to "extensive resources. Beyond that there are the operational sites as the MIR states – where consented reserves are worked.

The Proposed Plan may also want to give consideration to the effective restoration of coal sites that have been abandoned within the city region. The Scottish Government task force on opencast coal has been carrying out a number of initiatives to improve the situation and the SDP may want to make reference to the importance of finding solutions to prevent an undesirable legacy of dereliction. The aim is to comply with SPP para 235 and 237 in ensuring sustainable restoration of sites to beneficial after use and to minimise the impacts on local communities, the environment and the built and natural heritage.

## Scottish Government Response to SESplan2 MIR – 29 September 2015

There is no requirement in the SPP for strategic development plans to provide any spatial guidance on the location of onshore oil and gas developments. In line with the Scottish Government's cautious and evidence led approach to these developments, a moratorium has been put in place on the granting of consents across Scotland whilst further research and public consultation is carried out. However, as required by paragraph 240 of the SPP, LDPs should continue to identify those parts of their areas that are the subject of Petroleum Exploration and Development Licences (PEDL) issued by the Department of Energy and Climate Change whilst reflecting the Scottish Government's policy position for developments in these areas.

### **Q9 Waste**

Do you support the emerging content of SDP2 relating to waste?  
Please explain your answer. You may also suggest any changes.

**A** No response.

### **Q10 Housing Land across the SESplan Area**

As the bases for deriving the housing supply targets and housing land requirements within SDP2, do you support the:

- Preferred option 1, steady economic growth
- Alternative option 2, increasing economic activity with more high and low skilled jobs
- Alternative option 3, strong economic growth, or
- None of the options.

Please explain your answer. You may also suggest any changes.

Should SDP2 consider housing land supply targets that are lower than the housing need and demand estimates?

Please explain your answer.

**A** It is a statutory requirement when preparing the strategic plan for the National Planning Framework (NPF) to be taken into account. NPF3 sets out that Edinburgh is projected to be amongst the areas of highest population growth in Scotland (para. 2.4) resulting in acute housing requirements (para. 2.19). The strategic planning authority should be confident that the appropriate strategy is put in place to support delivery of the projected growth.

### **Q11 Housing Land in Edinburgh**

Do you support:

- Alternative option 1, all housing need and demand
- Preferred option 2, significant proportion or need and demand
- Alternative option 3, lower level of need and demand than options 1 or 2; or
- None of the options.

Please explain your answer. You may also suggest any changes.

**A** No response.

## Scottish Government Response to SESplan2 MIR – 29 September 2015

### Q12 A Generous Supply

Do you support the preferred option, alternative option or none of the options?  
Please explain your answer. You may also suggest any changes.  
If you support the alternative option, what range should the generosity allowance be set at?

A No response.

### Q13 Affordable Housing

Do you support the preferred option, alternative option or none of the options?  
Please explain your answer. You may also suggest any changes.  
What should the minimum provision for affordable housing on market led sites be set at?  
What should the requirement for affordable housing be set at within the overall housing supply target?  
Please explain your answer.

A The MIR proposes a minimum of 25% affordable housing provision as its preferred option with the alternative of “minimum levels of affordable housing above 25%”.

SPP sets out that where there is an identified shortage of affordable housing, the plan should set out the role that planning will take in addressing this and that the level of affordable housing required as a contribution should generally be no more than 25%. The LDPs should be clear on the reasoning behind any requirement for more than 25% affordable housing on particular sites.

### Q14 Housing Targets and Requirements

To derive the housing supply target and housing requirements across the SESplan area, SDP2 will consider a range of factors including economic, environmental and infrastructure opportunities and constraints.  
What factors should SDP2 consider and why?  
Is there another approach that SDP2 should consider?

SPP requires that housing supply targets and requirements are set for the SESplan area, each of the six LDP areas and for each functional housing market area. An [assessment of housing market areas](#) identified that the influence of the City of Edinburgh in terms of house sales extended well beyond its administrative boundaries. The functional housing market area was therefore defined as the SESplan area in its entirety, with fifteen 'sub housing markets' operating within it.  
Should SDP2 set housing supply targets at the level

- Directed by SPP; or
- Directed by SPP and the Sub-housing Market Area level?

Please explain your response. You may also suggest any changes, including alternative approaches.

A Table 4.1 in the MIR has been informed by the HNDA and provides 3 options for the basis of deriving the HST and requirement for housing land across the SESplan area.

Terminology – When the Proposed SDP is issued for consultation, Scottish Government will consider if the plan accords with national policy in SPP. We would therefore be keen to ensure that terminology and steps outlined in Diagram 1 of SPP

## Scottish Government Response to SESplan2 MIR – 29 September 2015

(at page 30) are clearly evident and displayed in an easy to read format e.g. HNDA / HST / Generosity / HLR.

Factors for SDP2 to consider - Scottish Government guidance on Housing Need and Demand Assessment (HNDA), A Manager's Guide (2014) sets out at paragraph 13.4 that in setting and agreeing the Housing Supply Target (HST), authorities should give full consideration to those factors which may have a material impact on the pace and scale of housing delivery and goes on to give examples of what these factors could include. It is important that this takes place at the strategic, rather than local development plan stage.

Level of targets - SPP sets out at paragraph 118 that SDPs should set out the housing supply target and the housing land requirement for the plan area, each local authority area, and each functional housing market area. The HNDA Manager's Guide (2014) advises at paragraph 13.6 'those local authorities covering large geographic areas or those with distinct sub-market areas may wish to set HST's at sub-local authority level'.

As set out in SPP, SDPs have a critical role to play in establishing the housing supply target and setting out the housing land requirement for local development plans - the Proposed Plan must therefore provide clarity for and certainty for all those involved in the process.

### Q15 **Town Centres**

Are there specific actions that SESplan should take to support strategic centres and Edinburgh city centre?

Are there other centres that SDP2 should identify as strategic town centres?

Should SDP2 seek to identify a hierarchy below strategic town centres?

**A** Town Centres First / Mix of Uses: We welcome the recognition in the MIR of the contribution town centres make to the region, and will expect to see this continue through to the Proposed Plan. We support the reflection of the Town Centres First Principle and the direction that LDPs should support town centres, including a diverse mix of uses.

Network of Centres: SPP sets out that plans should identify a network of centres and explain how they can complement each other. The USP tool, developed with the support of the Scottish Government and available on Scotland's Towns Partnership website <http://www.scotlandstowns.org/understanding-scottish-places>, provides details on the interdependent/ dependent nature of towns. There may be scope for the SDP to reflect more on the particular role of the various town and strategic centres, and what their particular vision is, and how together they may complement their different roles.

Town Centre Living: The Scottish Government endorses the ideas of encouraging more people to live in town centres, with one of the themes of the [Town Centre Action Plan](#) being Town Centre Living. [The Joint Housing Delivery Plan for Scotland \(2015\)](#) has a particular focus on town centres building on the Town Centre Living Strategy and what can be done to create more vibrant communities. The Joint Housing Delivery Plan for Scotland notes that new housing for a range of needs can bring life back into town centres and this action is to deliver specific demonstration projects. The SDP Proposed Plan should encourage LDPs to increase the provision

## Scottish Government Response to SESplan2 MIR – 29 September 2015

of housing in town centres by using regeneration opportunities on small sites to build new or refurbished homes.

### Q16 Strategic Green Networks

Do you support the preferred option, the alternative option or none of the options? Please explain your answer. You may also suggest any changes.

Do the SESplan green network themes and aims capture the key issues for green network development in the area?

Does the map of proposed regional green network priority areas identify the appropriate areas to focus on?

Are any priority areas missing from Figure 4.2? If so, which areas should be added and why?

- A** We support the preferred option, in identifying green network priorities. Delivery of the CSGN national development requires a step change in action, with coordinated approaches, and commitment to achieving change on the ground, we welcome the proposed approach of providing greater direction on delivery of the green network. National Planning Framework 3 sets out three priorities for the CSGN, during its lifetime: remediation of derelict land; prioritised action in disadvantaged communities; and active travel (walking and cycling), we welcome that the proposed priorities for SDP2 include these.

### Q17 LDP Transport Policy Direction

Do you support the preferred option, alternative option or none of the options? Please explain your answer. You may also suggest any changes.

Should SDP2 set out housing density requirements for large developments to promote sustainable transport, walking and cycling?

- A** Transport Scotland welcome the opportunity to comment on the SESplan SDP2 Main Issues Report (MIR). We have also welcomed the opportunity to be involved in (particularly) the Better Connected Place strand of the MIR development. We are encouraged by the level of key agency involvement in the SDP2, including the forthcoming Key Agency workshops to be held in September 2015. We have provided responses to the relevant consultation questions below - the key message is that a clear distinction should be made in SDP2 between transport interventions which have been subject to appropriate appraisal, and those which have not. Furthermore, clear identification should be provided in SDP2 as to which of the interventions are deemed to be required, and which are desirable, with regards to the delivery of the SDP2. Transport Scotland would not be in a position to support any interventions deemed to be required which have not been subject to appropriate appraisal.

We are supportive of the proposed amendments to Policy 8 of SDP1 to more explicitly promote a reduction in the need to travel to link the location of development to public transport and active travel networks. It is recommended to include a new bullet point detailing the need to appraise developments, which could read:

- Ensure that the potential specific and cumulative effects of development on the local and strategic road networks are appraised and, where required, the nature and scale of required interventions should be identified, along with an indication as to how these will be delivered.



## Scottish Government Response to SESplan2 MIR – 29 September 2015

We support the preferred option's approach of directing development that generates significant travel demand to centres, or areas which can be made highly accessible by public transport, walking and cycling. Holistic support of the town centres first approach throughout the plan is welcomed.

### **Q18 Regional Walking and Cycling Network**

Have the correct routes to be developed as regional routes been identified in Figure 5.2 (Regional Walking & Cycling Network)?

Are any routes missing? Should routes be removed? If so, please indicate which routes and why they should be included or removed.

**A** No response.

### **Q19 Prioritising Strategic Transport Infrastructure**

Do you support the preferred option, alternative option or none of the options?

Please explain your answer. You may also suggest any changes.

What transport priorities should be identified and how should transport infrastructure be prioritised? Please indicate any other strategic interventions which you consider should be included in Table 5.1.

**A** Transport Scotland have consistently stated our position on this matter, which is that identification of strategic transport interventions should be underpinned by appropriate and proportional appraisal, and in instances where interventions are included in Plans without this justification, Transport Scotland cannot support their inclusion. Including interventions without prior appraisal (and without clearly identifying where this has been done) can be misleading, particularly regarding the inference of commitment to delivery of such projects by their appearance in the SDP. Any strategic infrastructure proposed for inclusion within SDP2 should be the result of a robust, evidence led appraisal in accordance with DPMTAG. This involves the need to assess the constraints, opportunities, issues and problems within a specified area, which has not been consistently applied or undertaken for various schemes within the approved SDP1. Should aspirational schemes be included within SDP2 they should be clearly referenced as such, along with a clear pre-cursor that they have not been subject to the appropriate level of transport appraisal.

### **Q20 Infrastructure Delivery**

Do you support the preferred option, alternative option or none of the options?

Please explain your answer. You may also suggest any changes.

Should such a fund be established at the SESplan level, to maximise economies of scale and leverage, or piloted first in an individual SDA or growth corridor?

Where should the balance lie between public funding and contributions from development and how can risks be equitably shared between sectors?

Should a new system of developer contributions be introduced which, within the current legislation, enables contributions to fund measures which are needed to implement the strategy but may not be directly related to an individual development's impact.

**A** We would be supportive of the preferred option and SDP2 taking forward an innovative mechanism to deliver strategic infrastructure. Issue M indicates that it is

## Scottish Government Response to SESplan2 MIR – 29 September 2015

difficult to deliver new infrastructure at the strategic scale as legislation focuses on mitigating the local, direct impacts of new developments. While there are undoubtedly issues with regard to delivery of infrastructure required to support SDP spatial strategies, both SPP and Circular 3/2012, clearly state that the cumulative effects of development require to be considered. It is the mechanisms to facilitate contribution to this mitigation which poses the key challenge. It is encouraging to see that the preferred option is to investigate a strategic infrastructure fund for the SESplan area, and that a number of alternative or indeed combined features that such a fund may comprise are identified. We would be pleased to provide assistance to SESplan in its investigations and comment on any material produced in due course.

### **Q21 Funding Transport Infrastructure – Developer Obligations**

Do you support the preferred option, alternative option or none of the options?

Please explain your answer. You may also suggest any changes.

Should financial contributions be sought from development towards improvements on the [trunk road network](#)? Given the lack of capital funding available to deliver transport infrastructure, are there any alternative solutions?

- A** It is disappointing that the question of whether developer contributions should be sought for improvements to the trunk road network is included in the MIR, given national policy on this matter and that the Scottish Government/Transport Scotland's budgets and investment priorities often may not align with all development plan proposals. As a result it is clear that costs associated with interventions required to support delivery of development proposals will, as stated in paragraph 290 of SPP, require to be met by the developer. Notwithstanding this, Transport Scotland acknowledges that this process is challenging and that the preferred options stated in Issue M and N will assist in addressing this challenge.

### **Q22 Assessing the 5 Year Effective Land Supply**

Do you support the preferred option, alternative option or none of the options?

Please explain your answer. You may also suggest any changes.

- A** It is not clear from the information presented in the MIR as to the extent of effective land in the SESplan area and the MIR makes no mention to maintaining an effective land supply. This should be addressed in the Proposed Plan.

Please also see our response to Question 14. As a policy view of the number of homes to be delivered, the housing supply target (HST) should take into account wider economic, social and environmental factors, issues of capacity, resource and deliverability. This approach, set out in SPP paragraph 115, places emphasis on a plan-led and deliverable approach. The factors outlined in the MIR in Issue O could be factors used to set the HST. Applying the factors in arriving at the HST removes the need for them to taken into account again as part of the Housing Land Audit process. This would in effect equate to 'double counting' and would not be consistent with SPP.

You will be aware that Scottish Government are currently looking to publish guidance on development plan delivery, which will cover housing and infrastructure. It will incorporate contributions from a working group on defining 'effective land' and will

## Scottish Government Response to SESplan2 MIR – 29 September 2015

include advice on Housing Land Audits. We would expect the advice to be implemented by all authorities across Scotland.

### **Q23 Climate Change Adaptation**

Do you think SDP2 could do more to help the area adapt to climate change? Please explain your answer.

**A** No response.

### **Q24 Development Planning and Community Planning**

Do you consider that development planning and community planning in Edinburgh and South East Scotland could be better aligned? If so, please suggest ways in which this could be achieved.

**A** No response.

### **Q25 Strategic Environmental Assessment**

The [Interim Environmental Report](#) is produced alongside the MIR. It assesses the impacts of the options on environmental objectives and recommends ways in which the impacts can be avoided and mitigated. Do you have any comments on it?

**A** No response.

### **Q26 Other Issues**

Are there any other issues which SDP2 should address?

#### Housing – Specialist Provision

The section on Specialist Provision (paragraph 4.13 of the MIR) only considers the needs of Gypsy/Travellers and Travelling show people. In addition to these needs, SPP (paragraph 132) sets out that where a HNDA identifies need for accessible and adapted housing, wheelchair housing and supported accommodation including care homes and sheltered housing, planning authorities should prepare policies to support the delivery of affordable housing and consider allocating specific sites. The SDP should set out any requirement to meet the above needs based on the evidence set out in the Specialist Provision chapter of the SESplan HNDA.

#### Marine planning

We welcome paragraph 3.19 on marine planning and consider that it makes appropriate reference to the National Marine Plan and how it will be considered as the Proposed Plan develops. The planning authority should be aware that the National Marine Plan is of relevance to all public authorities decisions which may affect the marine environment and therefore its relevance could extend beyond provision of infrastructure and renewables etc. It should also be noted that the policies of the National Marine Plan is likely to have relevance to elements of the Proposed Plan beyond 'A Place to do Business' as it will impact on other policy areas such as maritime transport, marine/coastal tourism and recreation and possibly communities.

## Scottish Government Response to SESplan2 MIR – 29 September 2015

### Natural Environment

The MIR appears light on issues relating to the natural environment. We note paragraph 4.27 of the published monitoring statement is clear that enhancement of the natural environment as a valuable asset will be done through protecting the wider countryside and habitat networks through SDP policy. This is not clearly translated into the MIR. We note that the green network has the preferred option of being operated on a regional basis which is supported.

Although the previous SESPlan had a policy on flooding there doesn't seem to be a main issue on flooding and we didn't see anywhere that the policy would be pulled through. We would welcome some confirmation of how flooding will be addressed in the SDP.

### Transport

Paragraph 104 of the SPP states that local development plans should locate development which generates significant freight movements on sites accessible to suitable railheads or harbours or the strategic road network. The SDP may be able to provide a strategic context for this or at least highlight this as a requirement of LDPs. We understand for example that there have been discussions regarding sea freight improvements at Rosyth.

Regarding Figure 5.1 Transport network, it may be useful to also identify on the diagram or reference the city region's town centre bus stations alongside the other transport infrastructure. These will make a valuable contribution to the network alongside the park and ride sites and the rail stations.

### Noise

One of the actions in the Edinburgh agglomeration Noise Action Plan is to 'consider incorporating a commitment to mitigate environment noise emissions into future corporate and/or annual service plans'. There are a number of Candidate Noise Management Areas within the area of this plan therefore consideration should be given to how this can be taken account of.

See: [http://www.scottishnoisemapping.org/public/action-planning\\_END\\_2.aspx](http://www.scottishnoisemapping.org/public/action-planning_END_2.aspx)

SES plan should be aware that noise maps and action plans under the terms of the Environmental Noise Directive are to be produced every five years. The European Environment Agency provide a statistical report on how the numbers of people exposed to environmental noise change over time, as well as a comparison of all agglomerations in Europe see <http://www.eea.europa.eu/publications/noise-in-europe-2014>"

We would be happy to work with SESplan to explain further if this would help.

#### **Q27 How to Get Involved**

Are there any other forms of communication you would like SESplan to use during consultations?

**A** No response.