

## Comments

### Main Issues Report (21/07/15 to 30/09/15)

<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1426
<b>Response Date</b>	30/09/15 10:23
<b>Consultation Point</b>	Question 1 The Vision ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support the:</b>	Preferred Option

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

MGP welcomes the addition of the vision that “all forms of deprivation and inequality are reduced”. However we would suggest that, to have any prospect of delivery, a vision must be reflected in the policy proposals throughout the Plan. We can find no evidence of any such policies in the text of the MIR. There is widespread concern in Midlothian (and elsewhere in the SESPlan area) that the fundamental growth model underpinning SESPlan does not address one of the most vital needs – the provision of housing that is appropriate to the demand. The figures in the MIR demonstrate starkly that we must build more social housing, both in Edinburgh itself and in Midlothian. But the MIR contains no proposals to do that, and its housing policies, if implemented, could not possibly deliver it. This is the clearest example of the MIR’s failure to translate a vision of reducing deprivation and inequality into reality.

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1427
<b>Response Date</b>	30/09/15 10:24
<b>Consultation Point</b>	Question 2 A Strategy for Edinburgh and South East Scotland ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support</b>	None of the Options

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

MGP does not support the Growth Corridors option. It is a strategy designed to increase commuting to Edinburgh. It is based on directing development to “settlements within a 60 minute public transport journey time to key employment areas in and around Edinburgh”. This criterion would justify building more commuter housing in the whole of West Lothian, East Lothian, the Fife areas of SESPlan and all but the southern parts of the Scottish Borders. And while the emphasis is on encouraging travel by public transport, inevitably a proportion of those new commuters will travel by private car, leading to ever-increasing road congestion, concentrated at the points of the road network that already grind to a halt in the rush hour. We have been unable to find any evidence in the MIR of an assessment of how much additional road traffic will be generated by the Preferred Strategy, what that will mean for speeds, journey times and pollution, and how SESPlan proposes to mitigate those effects.

The Growth Corridors option is presented as a change from the existing strategy but that is not accurate as far as Midlothian is concerned. Development here is already concentrated along the A701 and A7/Borders Railway routes. Communities across Midlothian are increasingly concerned about coalescence and loss of green space, particularly along those corridors. The focus should be on providing employment and services closer to where people live, rather than generating more travel demand and using up green spaces and agricultural land for development. This will require a strategy of concentrating development, but doing so in a way that makes much more efficient use of the available land, for example through greater housing density and reduction of the land devoted to private car use.

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1428
<b>Response Date</b>	30/09/15 10:25
<b>Consultation Point</b>	Question 3 The Principles for Development ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Do you support the principles for development?** Yes

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

If these principles are to be enforced on local planning authorities, it should be clear that they are first of all being applied in SESPlan itself. But it is not clear that this is being done. The central growth strategy in the MIR would result in the allocation of large tracts of greenfield land for housing, a massive increase in commuting to Edinburgh, and severe pressure on infrastructure. It is hard to see how this accords with the stated principles of development.

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1429
<b>Response Date</b>	30/09/15 10:26
<b>Consultation Point</b>	Question 4 ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web

**Version** 0.1

**Do you support the above approach to direct LDPs to deliver high quality places?** Yes

**Please explain your answer. You may also suggest any changes, including other factors to be considered.**

Recent experience of housing developments in Midlothian suggests that they barely achieve the minimum standards of energy efficiency and sustainability. We would suggest that much stricter requirements are enforced on house builders to ensure that the housing sector plays a full part in meeting climate change targets.

We support the principle of delivering digital connectivity in new development. This has the potential to facilitate more home-working, thereby reducing the demand for travel, and, if delivered across the spectrum of housing types, would support the proposed SDP2 vision of reducing deprivation and inequality.

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1430
<b>Response Date</b>	30/09/15 10:27
<b>Consultation Point</b>	Question 5 Locations of significant business clusters ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support the</b>	Preferred Option

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

We support the preferred option. Businesses should be encouraged to locate in areas which will reduce the need to travel.

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1431
<b>Response Date</b>	30/09/15 10:28
<b>Consultation Point</b>	Question 6 The Visitor Economy ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support the preferred option?</b>	No

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

The preferred option is unclear – the only tourism/recreation development shown on Figure 3.1 of the MIR appears to be near the Forth Bridge. Midlothian’s most significant tourism assets – the Mining Museum and Roslin Chapel – should be recognised in the Plan.

Apart from those identified sites, Midlothian’s most significant tourism/recreation asset is the countryside itself. “Development” may devalue this precious asset. The Plan should make a clear commitment to protection of Midlothian’s rural landscape and environment and the strategy for tourism and recreation should facilitate sustainable access to those rural areas. In addition there should be a recognition that some types of development in rural areas, such as opencast mining, are detrimental to tourist or recreational enjoyment of those areas.

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1432
<b>Response Date</b>	30/09/15 10:30
<b>Consultation Point</b>	Question 7 Wind Energy ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support the emerging content of SDP2 relating to wind energy?</b>	No

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

The MIR only asks if consultees support “the emerging content of SDP2 relating to wind energy”. But this section of the MIR is about energy in general, not just wind energy. There is a vital need for SESPlan to deal properly with all aspects of energy. By next year there will be no thermal electricity generation anywhere in the SESPlan area and within the Plan period – under current policy - there will be no nuclear generation either. National policy supports all forms of renewable energy and, in particular, community ownership of energy assets. The focus of this section of SESPlan on onshore wind energy, and then almost entirely on its perceived visual impact, is far too narrow and will not assist the SESPlan member authorities to deliver on their commitments to empower communities to combat climate change.

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

This question is based on an assumption that the most important cumulative impact of any energy development is the visual impact of onshore wind turbines. This is too narrow a view and should not drive the SDP2 policy on cross-boundary impacts.

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1433
<b>Response Date</b>	30/09/15 10:31
<b>Consultation Point</b>	Question 8 Resource Extraction ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web

**Version** 0.1

**Do you support the** None of the Options

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

As a matter of policy, coal-fired electricity generation is being phased out across the UK. Under current plans there are unlikely to be any coal-fired power stations left in the UK after 2023. The last coal-fired station in Scotland closes in six months' time and that will eliminate a substantial part of the demand for coal from opencast sites in Scotland. Any coal from Scotland will then have to be exported to power stations in England and Wales. This will require rail access, which is not available at most sites. The reality is that the coal market is in terminal decline and providing for it in SESPlan is anachronistic and contrary to the overall aims of the Plan.

Designating areas of search for opencast coal has the effect of blighting those areas for other more sustainable forms of development. It also facilitates a form of development that, on recent experience across Scotland, leads to dangerous and polluting unrestored sites, with restoration liabilities that may end up being borne by the taxpayer and local authorities.

We therefore disagree with the preferred option of requiring LDPs to designate areas of search for opencast coal. Instead, there should be clear, consistent and strict criteria for the planning assessment of any applications for opencast coal sites, and there should be a presumption against such developments anywhere in the SESPlan area.

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**Comment by** Midlothian Green Party ( )

**Comment ID** 1434

**Response Date** 30/09/15 10:31

**Consultation Point** Question 9 Waste ([View](#))

**Status** Submitted

**Submission Type** Web

**Version** 0.1

**Do you support the emerging content of SDP2 relating to waste?** Yes

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

We support the general principles of the Zero Waste Plan but we are opposed to the use of incineration to dispose of waste. There should be a clear plan to reduce and, as far as possible, eliminate incineration as a method of waste disposal. There should also be a clear plan to match up the supply of and demand for materials going to landfill, so that, for example, inert building site waste can be disposed of efficiently by meeting the demand for in-fill materials to restore abandoned quarries or meet other demands for in-fill materials. Plans for food waste collection should be assessed against an alternative strategy of promoting composting and maximising local use of compost materials.

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**Comment by** Midlothian Green Party ( )

**Comment ID** 1435

**Response Date** 30/09/15 10:33

<b>Consultation Point</b>	Question 10 Housing Land across the SESPlan Area ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>As the basis for deriving the housing supply targets and housing land requirements within SDP2, do you support the</b>	None of the Options

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

Options 2 and 3 are not credible projections for the future economic growth of the SESPlan area. However, even Option 1 assumes levels of growth that may not be realistic. Housing completion rates 11% above the average for 2004 to 2014 assume a level of growth that has so far not been attained.

Consequently, we do not support the allocation of any further land for housing in Midlothian. The MIR shows that the housing land supply in Midlothian is already 211% of the identified need. Communities across Midlothian are already under severe pressure from the additional housing developments, both in terms of coalescence and loss of community identity, and strain on transport, education and medical services. We would propose removing some of the current areas designated for housing from the Midlothian allocation. There is no evidence that the current planned numbers are required, and since they are based on a scenario in which Edinburgh's demand is met by forcing people to commute from further and further away from the city, they are fundamentally unsustainable.

SDP2 should also radically revise the current strategy for providing 'affordable' housing. Requiring private developers to make 25% of their stock "affordable" cannot possibly meet the demand in Midlothian for 73% of houses to be affordable, let alone the need for 64% of houses to be in the social rented sector. Referring back to the SDP2 'vision', if SESPlan cannot set out a credible means to deliver the 50,000+ social houses that it identifies are required, it will do nothing to reduce deprivation and inequality.

<b>Should SDP2 consider housing land supply targets that are lower than the housing need and demand estimates?</b>	Yes
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**Please explain your answer.**

We believe the over-provision of housing land in Midlothian is so great that it now requires land to be de-allocated from housing and made available for other uses, or protected from development.

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1437
<b>Response Date</b>	30/09/15 10:34
<b>Consultation Point</b>	Question 11 Housing Land in Edinburgh ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Do you support**

None of the Options

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

The current proposed plan cannot meet the principal demand – which is for social housing in Edinburgh. Any credible plan to meet that need must focus on providing those houses in Edinburgh, and developing a radically different plan for the city, based on reducing travel demand, meeting local needs locally, building houses that match the trends in household size and that are at a density that makes the most efficient use of the available land in the city.

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1439
<b>Response Date</b>	30/09/15 10:35
<b>Consultation Point</b>	Question 12 A Generous Supply ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support the</b>	None of the Options

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

Allocation of land for housing in Midlothian is more than twice the assessed level of demand. We propose that some of those land allocations should be removed. We do not support a 'generosity allowance' since previous plans have already been twice as "generous" as required.

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1442
<b>Response Date</b>	30/09/15 10:36
<b>Consultation Point</b>	Question 13 Affordable Housing ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support</b>	Alternative Option

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

The current system of requiring developers to make 25% of their housing affordable does not work. It is also not at all clear that it can deliver any of the required social housing. The demand for affordable housing across SESPlan is almost two thirds of the total demand. In Midlothian it is even higher. SESPlan must surely, therefore, have an overall plan to deliver two thirds of built houses as "affordable". But that will require something other than asking private developers to provide those houses as part of otherwise "unaffordable" developments.

**What should the minimum provision for affordable housing on market led sites be set at?**

See above

**What should the requirement for affordable housing be set at within the overall housing supply target? Please explain your answer.**

See above

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1444
<b>Response Date</b>	30/09/15 10:37
<b>Consultation Point</b>	Question 14 Setting Housing Targets and Requirements ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

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?**

See response to Question 13

**Is there another approach SDP2 should consider? Please explain your answer.**

See response to Question 13

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1446
<b>Response Date</b>	30/09/15 10:38
<b>Consultation Point</b>	Question 15 Town Centres ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

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

SESPlan appears to have no proposals for strategic town centres in Midlothian. The stated support for town centres rather than out of town developments is welcomed. However it is hard to see how the overall growth strategy set out in the SDP2 MIR can support the regeneration of town centres. Out of town developments continue to expand and are directly responsible for sucking demand out of cities and towns within car commuting distance. A growth strategy based on large numbers of people commuting long distances to Edinburgh to work, many of them by private car, is likely to increase demand for out of town developments. The emphasis needs to be on providing local goods and



services to meet local demand, maximising the range of workplaces, shops and services that are within walking and cycling distance of homes.

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1449
<b>Response Date</b>	30/09/15 10:39
<b>Consultation Point</b>	Question 16 Strategic Green Networks ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support</b>	None of the Options

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

While we support a policy that will ensure that housing and other developments include minimum standards of green space, we believe it is also essential to protect agricultural land and other uses within the Green Belt from development.

The Green Networks concept is fundamentally different from the policy of Green Belts. The latter provides a degree of protection of undeveloped land against any form of built development. But Green Networks appear to only apply within areas where development will occur.

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

See above

**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?**

See above

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1464
<b>Response Date</b>	30/09/15 11:08
<b>Consultation Point</b>	Question 17 LDP Transport Policy Direction ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support</b>	None of the Options

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

Transport strategy should be aimed at reducing the demand for travel. The MIR does not do that. It promotes development within a one hour journey from places of work.

There should be much more effort to minimise transport demand by locating places of work close to housing, and vice versa, and having local cycle and pedestrian path networks that encourage sustainable travel. This must include cycle and pedestrian routes that are not simply parallel adjuncts to existing roads.

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

Yes

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1466
<b>Response Date</b>	30/09/15 11:09
<b>Consultation Point</b>	Question 18 Regional Walking & Cycling Network ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Have the correct routes to be developed as regional routes been identified in Figure 5.2 (Regional Walking &amp; Cycling Network)?</b>	No

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

The purpose of regional-level cycle and walking routes is not clear. Most journeys on foot and by bike are local journeys, whether for leisure, travel to work, or shopping. The facilitation of walking and cycling networks should be primarily at that local level.

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1470
<b>Response Date</b>	30/09/15 11:10
<b>Consultation Point</b>	Question 19 Prioritising Strategic Transport Infrastructure ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support the</b>	None of the Options

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

The proposal to prioritise transport infrastructure is not backed with any impact assessment. While the top-priority A720 improvements are clearly designed to reduce road congestion, there is no evidential back-up to demonstrate how that would occur. Past experience is that generating additional road capacity only generates additional traffic. The strategic priority must be to encourage and facilitate modal shift from private cars to public transport, cycling and walking.

**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.**

Early experience with the Borders Railway is that there is not enough train capacity and not enough line capacity. Service trains have to be cancelled if a charter is running; there is insufficient double track to allow for greater frequency; and two-coach trains are standing-room only in the rush hour. If SESPlan promotes a 'Growth Corridors' strategy, with more commuters travelling in the A7 corridor, further railway capacity is essential if we are to limit the road congestion caused by the strategy.

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1478
<b>Response Date</b>	30/09/15 11:13
<b>Consultation Point</b>	Question 20 Infrastructure Delivery ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support the</b>	Preferred Option

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

We support the establishment of a strategic infrastructure fund. Current developer contribution mechanisms have failed to deliver adequate facilities.

**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.**

Yes

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1480
<b>Response Date</b>	30/09/15 11:14
<b>Consultation Point</b>	Question 22 Assessing the Five Year Effective Land Supply ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Do you support the

None of the Options

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

As set out in our response to earlier questions, we believe that housing land has been over-allocated in Midlothian and that some of that land should be de-allocated to allow it to be released for other uses, including remaining undeveloped. In addition, housing land guidance must be focused on meeting the principal demand - for social housing.

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1486
<b>Response Date</b>	30/09/15 11:17
<b>Consultation Point</b>	Question 23 Climate Change Adaptation ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

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

Climate change mitigation should be prioritised over climate change adaptation, but both are required. In relation to adaptation, the plan should include proposals for the protection of agricultural land from development so that it can be used to meet local food demand.

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1487
<b>Response Date</b>	30/09/15 11:18
<b>Consultation Point</b>	Question 24 Development Planning and Community Planning ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**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.**

We support the development of a planning system that starts from local needs and views. This should be an integrated system that takes account of the needs for medical and social services – the current remit of community planning - as well as identifying where different types of development should be located. A number of community councils in Midlothian have produced Neighbourhood Plans that set out community aspirations for how their areas should develop. These have the potential to be the basis for a new integrated, community-led approach to planning.

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1488

<b>Response Date</b>	30/09/15 11:18
<b>Consultation Point</b>	Question 26 Other Issues ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Are there any other issues which SDP2 should address?**

There is no clear plan in the MIR for reducing carbon emissions, despite this being part of SESPlan's vision.

There should also be a clear plan for protecting agricultural land in view of the growing importance of local food production for local needs in an environment affected by climate change.

There is also no clear plan in the MIR for achieving the SDP2 aim of reducing deprivation and inequality.

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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1489
<b>Response Date</b>	30/09/15 11:19
<b>Consultation Point</b>	Question 27 How to Get Involved ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

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

The MIR consultation process does not facilitate community involvement. The presentation of a suite of documents makes it difficult for most community members to participate. We would suggest that community consultation about aims, vision and overall development strategy should precede the production of a Main Issues Report, and should be done through a series of community workshops. This would ensure that the community view is embedded in the process.

<b>How did you hear about the Main Issues Report Consultation?</b>	Email
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<b>Comment by</b>	Midlothian Green Party ( )
<b>Comment ID</b>	1496
<b>Response Date</b>	30/09/15 11:25
<b>Consultation Point</b>	Question 5 Locations of significant business clusters ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

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

Midlothian Green Party also supports the addition of a 'Sustainable Growth Sector' business cluster based on the remaining Green Belt. This would include community-led enterprise, focused on local sustainable food projects (market gardens, community agriculture, crofts etc) and community renewable energy. Small business and social enterprise would be encouraged through provision of affordable workshops and retail space.