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Dear Sir or Madam,

Reference MIDLOTHIAN LOCAL DEVELOPMENT PLAN (MLDP) 2015

I wish to object to the above Plan on the general grounds that the policies contained in the plan are unsustainable, and through the massive scale of new private housing which will further diminish the amenity of existing communities, and result in coalescence and merging of communities; placing additional unsustainable pressures on our already struggling educational, social care and health service and accelerating the large scale loss of precious and fragile Greenbelt, Agricultural Land, Open Spaces, River Valley, Landscapes and Woodlands.

My objections also include concerns regarding the exclusive and confused consultation process -

The democratic deficit in the production of the MLDP, evidenced by members of the public being excluded from the December 2014 Midlothian Council MLDP meeting, contrary to democratic transparency and accountability. The MLDP references 20 additional documents of Supplementary Guidance and a Transport Options Appraisal that are unpublished and unavailable to the public. The failure to provide public information and consultation is also reflected in the absence of Midlothian Council MLDP public information meetings. This lack of transparency and accessibility prevents members of the public from accessing complete detailed MLDP information and is contrary to all acceptable values of community engagement, democratic transparency, and accountability. There is an inconsistency between MC rhetoric, commitments to Community Planning, public engagement and MLDP Policies and practice where community concerns and large scale objections to development proposals are being disregarded. These deficits render the MLDP Consultation process unviable and pointless.

I request that the 2015 MLDP consultation process be suspended until full information, including all 20 notes of Supplementary Planning Guidance and MLDP Transport Options and Appraisal reports are published and available to the public and there has been an opportunity for a fully informed, fair and open public consultation process.

1.1 The Vision There is a clear contradiction between the plan's vision and the weakening of protective policies contained in earlier Local Plans. The policy changes are most evident in relation to the reduced policy protection from destructive development, coalescence and urban sprawl within Historical Villages, Communities, Boundaries, Green Belt; River valleys; Agricultural Land and Open Spaces. The principle drivers of (MDLP) are unsustainable population growth and increased prioritisation of unsustainable economic growth. The dramatic increase in housing development, is pulling in population. The plan fails to provide sufficient and specific robust policies and quality standards for protection of our communities, amenities, public services, agricultural and scenic landscapes, green areas, river valleys and biodiversity.

Policy Dev 1. states that neighbouring communities will have their physical and visual separation protected. However MLDP's massive allocation of housing land risks undermining the cohesion and quality of life of a number of towns and communities through loss of green spaces and merging the margins between town, country, villages and retail parks. Many settlements have areas of green belt, woodland and, river valley as natural boundaries. However despite the 2008 local plan's protective policies, many of these natural boundaries have been lost. The MLDP boundaries in some areas are reduced to small strips of grass. Instead of being weakened MLDP protective policies require to be strengthened to prioritise protection of community green boundaries, and agricultural land. Coalescence already exists throughout the County. New houses are typically further away from public transport; employment locations; shopping; and community facilities and depend on car use. Further new housing on the scale proposed will increase Midlothian's status as a dormitory of urban sprawl. MLDP should prioritise reducing the existing high level of commuting through proactive robust Local Plan policies on shopping, housing, retail and employment to build a region where people choose to live, learn, work, shop, grow food and play.

Policy Dev 2. Protecting Amenity within the built up Area states that development will not be permitted within existing and future built up areas where it is likely to detract materially from the existing character or amenity of the area. This policy is already being breached at a number of sites and villages. The MLDP development strategy risks undermining the cohesion and quality of life of a number of existing towns and communities by eroding the rural margins between urban areas and placing strains on community infrastructure. Serious concerns exist regarding the pressures on existing communities from new housing, loss of green spaces and inappropriate poor quality and unsustainable large scale housing and retail developments. The protection of green spaces, both within urban areas and by policies restricting urban spread into the countryside, should be prioritised and rigorously enforced within consistent transparent and representative community planning practice.

Policy Econ1. MLDP locates employment on green belt and prime agricultural land, requiring new infrastructure to service developments. Instead employment

opportunities should be directed towards Brownfield sites and within existing population centres

Policy TCR Town Centres. Existing town centres are being degraded by Midlothian Council's continuing promotion of out of town shopping. Robust policies need to be put in place to direct new development to existing town centres.

Policy TRAN1. Sustainable Travel. Within the MLDP little account is given to the large scale increase in car ownership, arising from the high number of proposed housing sites. Transport proposals focus on new roads. With the huge amount of new housing developments contained in the MLDP the projected scale of increase in road traffic in Midlothian needs to be radically re-assessed. It is now accepted that construction of new roads merely creates additional demand to fill the new capacity. Similarly, creating new housing, retail and industrial/commercial developments that encourage road transport inevitably generates demands for new roads. The solution lies in re-evaluating the relationships between new housing, shopping and employment areas, with a focus on reducing demand for road transport. The large scale strip development of housing, tourist accommodation and commercial use proposed along the A702 corridor and loss of Greenbelt and Agricultural land will pull further traffic to these already congested areas. The unavailability of a sustainable traffic management policy within MLDP is a key feature underpinning my request for suspension of the MLDP Consultation process and a moratorium on allocation of additional housing development sites, until all Supplementary Guidance documents and Transport options appraisal are publicly available.

Protecting our Heritage Policy ENV1. Protection of the Green Belt is fundamentally flawed by permitting "Essential Infrastructure" to be carried out within the Green Belt and no planning policy criteria are defined for "Essential Infrastructure" thus allowing Developers to interpret and defend this definition in ways positive to their development demand. As a priceless resource for the benefit of all, the Greenbelt also acts as 'the lungs' of the area, providing clean air, clean water and top soil, a recreational space, a beautiful gateway to Midlothian a haven for wildlife, and most importantly an essential agricultural asset in realising the security of a sustainable, post-fossil fuel, future. It is essential that MLDP policies are strengthened to safeguard Green Belt and Green field sites and to ensure that Brownfield and windfall sites are clearly recorded and always developed first and that robust recognition and protection is afforded Green Belt and Greenfield land. Detailed Green Belt protection policies and strategy should be outlined in MLDP and implemented rigorously in order to assure viable long term ecological sustainability of these fragile landscapes and precious agricultural resources.

Policy ENV4. Prime Agricultural Land. The MLDP admits that a number of the allocated development sites are on prime agricultural land. This allocation graphically illustrates the absence of robust policy protection for our remaining agricultural landscapes. MLDP needs to adopt a more rigorous approach to protecting the national value of this land as a designated "Food Belt" rather than yet another source of housing and retail locations.

ENV 7. Landscape Character. Development programmed within the MLDP will adversely affect the existing landscape character of Midlothian. Areas of Landscape Value have been allocated for economic and tourism development. Similarly an area of Landscape Value lying between Bonnyrigg and Eskbank is about to be lost to a housing development at site Hs9. Once this land is developed the communities will have coalesced with the loss of identity and should be removed from the MLDP. The housing sites Hs2 and Hs3 should also be removed as development sites due to them being located in the designed landscape of Melville Castle. Policy MIN3 should be amended as follows: Proposals for oil and gas extraction will not be permitted.

ENV 8. Protection of River Valleys. Much of the river valleys were gifted to Midlothian Council, with a legal responsibility to maintain the land as natural ancient woodland, and to protect it against built development. The 2008 Local Plan Policy RP9 gave protection to the river valleys against development. Rather than strengthening RP9 policy, the current MLDP proposes development where the river valleys run through urban areas. Although the river valleys run through many developed areas there is no definition within the plan of "urban area" criteria, thus opening the door to development creeping in throughout river valley woodlands adjacent to Midlothian's urban sprawl. In the same way that initial pockets of development allowed within Midlothian Agricultural Greenbelt combine to produce a dramatic loss of green belt and countryside, the river valleys and their ancient woodlands are now also vulnerable through the loss of RP9. The North and South Esk river valleys woodlands should be protected entirely, with a presumption against all development. To this end Policy RP9 contained in the 2008 Midlothian Local Plan should remain in place and be strengthened by more robust planning practices that prioritise protection of these precious and fragile community assets.

I request the 2015 MLDP consultation process be suspended until full information, including all 20 notes of Supplementary Planning Guidance, and a current MLDP Transport Options Appraisal Report are publically available; and there should be a stop on all new housing developments until community concerns regarding already overburdened schools, medical services and roads, merging communities, protection of precious green belt spaces and agricultural land, are reflected in a full, fair and open public consultation process and responsive MLDP policies.

Name _____

Address _____

Signature _____

Date _____