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COUNCIL EXECUTIVE

EDINBURGH CHOICES FOR CITY PLAN 2030 - CONSULTATION RESPONSE

REPORT BY HEAD OF PLANNING, ECONOMIC DEVELOPMENT & REGNERATION

A. PURPOSE OF REPORT

The purpose of this report is to advise Council Executive of the City of Edinburgh Council's Choices for City Plan 2030 and the council's proposed response.

B. RECOMMENDATION

It is recommended that Council Executive:

1. notes the terms of the report;
2. agrees the proposed response to the consultation as set out in Appendix 1; and
3. agrees to forward the report to the City of Edinburgh Council as the council's response to the consultation.

C. SUMMARY OF IMPLICATIONS

I	Council Values	Focusing on our customers' needs; being honest, open and accountable; making best use of our resources; working in partnership.
II	Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	Preparation of local development plans (LDP) is a statutory requirement. City of Edinburgh Council has prepared an Environmental Report to inform the LDP together with a number of supporting documents including an integrated impact assessment which covers equality and health matters.
III	Implications for Scheme of Delegations to Officers	None.
IV	Impact on performance and performance Indicators	None.
V	Relevance to Single Outcome Agreement	Linked to council's own SOA.

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| VI | Resources - (Financial, Staffing and Property) | Progressing discussions to fully assess the cross-boundary impacts of a potential development adjacent to West Lothian Council's boundary will require staff resource; there may be financial implications in terms of education provision which at present cannot be quantified. |
| VII | Consideration at PDSP | <p>Ordinarily, a report would have been prepared for the Development & Transport PDSP. The timing of the consultation has not allowed for reporting to the PDSP. All members of the panel have been consulted on the proposed response.</p> <p>One response was received which confirmed support for a mixed strategy of brownfield and greenfield development; the development of green corridors between settlements and the development of park and ride facilities in West Lothian.</p> <p>Separately some local members raised legitimate concerns about the impact an expansion of Calderwood may have on the infrastructure in West Lothian. These are legitimate concerns and the emphasis of the response in relation to Calderwood has been changed accordingly.</p> |
| VIII | Other consultations | Roads and Transportation Manager, Education Planning, Environmental Health. |

D. TERMS OF REPORT

D1 Background

The City of Edinburgh Council is progressing its next Local Development Plan (LDP2). The plan is being progressed under the requirements of the Town and Country Planning (Scotland) Act 1997, the approved Strategic Development Plan for South East Scotland (SDP1), Scottish Planning Policy and Circular 6/2013 Development Planning. The first stage of this is the preparation of a Main Issues Report (MIR). This stage is not a draft version of the plan. It concentrates on the key changes that have occurred since the previous LDP which was adopted in 2016 and on the City Council's big ideas for future development. The Choices for City Plan 2030 outline the preferred options but also considers reasonable alternatives.

The Choices for City Plan 2030 outlines 16 choices that include proposals for the spatial strategy and policy changes. Each choice has the City of Edinburgh Council's preferred solution with one or more alternatives. Of the 16 choices, five are particularly relevant to West Lothian and responses on these are detailed in this report and Appendix 1.

Not all of the choices set out in the consultation will have impacts in West Lothian and, as such, no response on these is proposed. The matters which will have a potential impact are set out in Appendix 1 to this report.

Subsequent to the proposed response being published for Council Executive on 24 March 2020 some local members have raised concerns about the impact an expansion of Calderwood may have on the infrastructure in West Lothian. These are legitimate concerns and the emphasis of the response in relation to Calderwood has been changed accordingly to indicate that the council objects to the expansion of Calderwood.

Some changes have also been made to the covering report to reflect the changes noted above but also to clarify that the consultation from the City of Edinburgh Council is based around a number of alternative solutions but with Edinburgh's preferred solution being identified within the options set out in the consultation.

D2 Choices for City Plan 2030 - Housing

In order to meet the City of Edinburgh Council's proposed housing targets, the consultation outlines three options in Choice 12. These are:

- Option 1: Delivery by the Council and its partners within the [Edinburgh] urban area
- Option 2: Delivery through market housing by releasing greenfield land [in the City of Edinburgh council area]
- Option 3: A blended approach (of Options 1 and 2)

Edinburgh's preferred option is to accommodate the housing land requirement within the urban area (Option 1). Option 2 and Option 3 identify the possibility for a significant greenfield release on Edinburgh's western periphery on the boundary with West Lothian as an extension to the Calderwood development in East Calder for between 1,400 and 2,500 houses. It should be stressed, however, that this is not The City of Edinburgh Council's preferred option.

In other choices related to housing delivery set out in the consultation, the preferred options include:

- Proposals to restrict the number of holiday and other short term lets (Choice 9).
- Proposals to increase affordable housing requirement from 25% to 35% (Choice 13).
- Proposals that across the city, on both urban areas and greenfield sites, housing development must achieve a minimum of 65 dwellings per hectare (Choice 2).

D3 Choices for City Plan 2039 – Other Matters

The consultation continues to recognise the potential for West Edinburgh to deliver economic growth. While no specific sites close to the West Lothian boundary are identified, Choice 14 proposes that the whole of the West of Edinburgh from the city bypass to the boundary with West Lothian is an area of search. The consultation proposes that this will allow a wide consideration of future uses within West Edinburgh without being tied to individual sites.

Other notable proposals are:

- Transport Infrastructure – based on an Edinburgh Strategic Sustainable Transport Study, two corridors are identified as being suitable for the delivery of new transit-solutions to help deliver City Plan 2030. Delivery of Tram or Bus Rapid Transit towards Newbridge and International Business Gateway (IBG) would support existing major development along the A8 corridor and support regional level commuting from settlements in West Lothian and the potential opportunity for further transit-led development (Choice 5).
- A proposed super cycle highway along the route of the A71 linking South Livingston with West Edinburgh (Choice 8).

D3 The Proposed Response

The proposed response supports the City of Edinburgh Council's preferred option with respect to housing delivery. The response sets out an objection to the alternative choices for housing delivery with respect to land adjacent to Calderwood as the Choices for the City Plan 2030 does not properly identify or address the impact of these proposals on West Lothian communities.

The Choices for City Plan 2030 does not properly address the education impact of the Calderwood proposal nor does it address infrastructure capacity along the A71 corridor. In particular it is noted that proposed transport corridor interventions along the A71 are not supported in the Choices for the City Plan 2030 as they are unlikely to be deliverable before 2030. In any case, the corridor does not come fully up to the West Lothian boundary. These matters make any proposals for development at Calderwood inconsistent with the wider aspirations of the City Plan particularly with regards to sustainability and wider climate change challenges.

The proposed response focuses on the following Choices as these are considered to be most relevant to West Lothian:

Choice 2: Improving the quality and density of development;
Choice 7: Supporting the reduction of car use in Edinburgh;
Choice 8: Delivering new walking and cycle routes;
Choice 12: Building our new homes and infrastructure; and
Choice 14: Delivering West Edinburgh

The options explored in the City Choices Plan 2030 and the solution to deliver such proposals will have implications for West Lothian Council. These require to be fully assessed and there is no indication in the consultation as to how these implications will be identified and, more importantly, mitigated. Impacts in West Lothian will include implications on the education estate and traffic on the A71. The council's ability to deliver its own market and affordable housing need timeously will also be affected.

In addition to significant concerns about an extension of Calderwood the proposed response also sets out a recommendation that infrastructure improvements cannot be confined to the City of Edinburgh Council boundaries and that cross-boundary infrastructure improvements are likely to be necessary to support any development in West Edinburgh and close to the West Lothian boundary.

Support for the A71 '*super cycle highway*' is *proposed*, but it is intimated that to be effective this would require to link into Livingston. Overall A71 capacity, Kirknewton Station Park and Ride capacity and denominational primary and secondary education infrastructure capacity would also need to be addressed.

An option set out in the Choices for City Plan 2030 is to outline an '*area of search*' which allows a wide consideration of future uses within West Edinburgh without being tied to individual sites (Choice 14). The proposed response to the Choices for City Plan consultation raises concern for such an approach. Firstly, potential concerns are raised about coalescence and impacts on infrastructure in West Lothian. Secondly, concern is raised regarding West Lothian Council's ability to engage in a meaningful way when an '*area of search*' is proposed rather than specific sites. The response outlines that the council would wish to engage with the City of Edinburgh Council in a meaningful manner.

To promote and encourage sustainable travel, further active travel routes and park and ride locations have been suggested and included in the proposed response to the consultation.

E CONCLUSION

Choices for City Plan 2030 sets out options to accommodate future development and growth within the City of Edinburgh Council's administrative area. These are likely to have implications for West Lothian, particularly in relation to any future development close to the Calderwood development at East Calder which would not be supported by the council.

Progress on the City of Edinburgh Council's Local Development Plan (LDP2) will require to be monitored in order to assess the impact on West Lothian and to allow for cross-boundary impacts to be more fully assessed.

F. BACKGROUND REFERENCES

<https://consultationhub.edinburgh.gov.uk/sfc/choicesforcityplan2030/>

Appendices/Attachments: One

Appendix 1: Edinburgh Choices for City Plan 2030 - Consultation Response

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APPENDIX 1 – Consultation Response

West Lothian Council Submission to City of Edinburgh Council “Choices for City Plan 2030”

The feedback on 16 choices for the City Plan 2030 requires to be fed in through a prescribed online survey form. There are 68 questions in total. The intention is to answer just five of the questions. This will be sufficient to express West Lothian Council’s position at this stage. As the City of Edinburgh Council’s LDP progresses to Proposed Plan stage, there will be more detail on which to comment and comments will not be restricted to prescribed questions.

Choices for City Plan 2030 Question	West Lothian Council’s proposed response to question
<p>Choice 2 – improving the quality and density of development</p> <p>2B. We want to revise our policies on density to ensure that we make best use of the limited space in our city and that sites are not under-developed. Do you agree with this?</p> <p>We want to change our policy on density to maximise the benefits of being close to public transport services and along high-quality active travel routes, provided that the design of such developments is of a high quality, respects amenity, and is of an appropriate character.</p> <ul style="list-style-type: none"> • Across the city, on both urban area and greenfield sites, housing development must achieve a minimum of 65 dwellings per hectare. • Where identified in the plan, higher density housing development with a minimum of 100 dwellings per hectare will be required. • A vertical mix of uses to support the efficient use of land. 	<p>See response to Choice 12. While not a preferred option, the potential allocation of land adjacent to Calderwood for housing is inconsistent with the desire to locate buildings close to public transport.</p> <p>While the council understands the desire to increase densities and generally supports the sustainability principles of this in the city, it is felt that this is only an appropriate strategy within the city.</p>

Choices for City Plan 2030 Question	West Lothian Council's proposed response to question
<p>Instead we could continue using our existing policy on housing density which seeks an appropriate density based on the characteristics of the surrounding area, not based on maximising the benefits of achieving higher densities and being close to high quality public transport services.</p>	
<p>Choice 7 – Supporting the reduction in car use in Edinburgh</p> <p>7D. We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride and extensions, including any other sites that are identified in the City Mobility Plan or its action plan. Do you agree with this?</p> <p>We want to safeguard sites for new park and ride at Gilmerton Road, Lasswade Road and extensions to the current sites at Hermiston and Newcraighall. There is also the potential to safeguard an extension to the park and ride at Ingliston as part of the International Business Gateway masterplan, along with any other sites arising from the consultation on the City Mobility Plan.</p>	<p>WLC understand the desire to reduce car use within Edinburgh. In addition to improvements to active travel routes, ambitious alternative methods to the use of the car from travel outwith the Edinburgh area will be required. It is important to WLC that our residents are able to access the city in a sustainable way and that Edinburgh residents who travel to West Lothian for employment or enjoyment can do likewise.</p> <p>Consideration should therefore be given to safeguarding provision for a park and ride / interchange facilities at Newbridge / Broxburn. This could be associated with the extended tram line shown on Map 11. This may assist those approaching Edinburgh from the M8, M9, Broxburn / Uphall and Winchburgh.</p> <p>The absence of a tram connection at the Hermiston park and ride significantly reduces its usefulness to West Lothian (and CEC) residents. Whilst the development of a tram route along the A71 is outlined as a possibility (Strategic Sustainable Transport Study, Corridor 8), connection to Hermiston Park and Ride and Heriot Watt University (HWU) would greatly improve connectivity and reduce the need for car use. This would also create a tram link between HWU and the airport.</p> <p>The absence of park and ride facilities at Hermiston Gait / Edinburgh for M8 / A720 traffic is a significant gap. The council recommends P&R</p>

Choices for City Plan 2030 Question	West Lothian Council's proposed response to question
	<p>facilities here to allow ease of transfer to tram, train and bus at this location.</p> <p>To meet the change towards electric vehicles, Park and Rides should over time be upgraded to provide slow charging facilities at <i>each</i> space. If vehicles are left for extended periods, there is little need for rapid or fast charging facilities.</p>
<p>Answer Choice 8 – Delivering new walking and cycle routes</p> <p>8B. As part of the City Centre Transformation and other Council and partner projects to improve strategic walking and cycling links around the city, we want to add the following routes (along with our existing safeguards) to our network as active travel proposals to ensure that they are delivered. Do you agree with this?</p> <p>Active travel routes to be added to City Plan 2030</p> <ul style="list-style-type: none"> • Completion of the River Almond Walkway • The A71 cycle super highway linking south Livingston with West Edinburgh • Edinburgh Waterfront Promenade (realigned – Granton Beach through Granton Waterfront and Western Harbour to Ocean Terminal; Ocean Terminal to Leith Links avoiding operational port estate) • The Pentlands to Portobello link • Meadows to George Street • City Centre East-West Link • Waverley Valley bridge link • Lothian Road • West Edinburgh Link • Roseburn – Union Canal • Lochend – Powderhall 	<p>Yes. However, clarity of funding will be required particularly where the interventions cross local authority boundaries.</p>

Choices for City Plan 2030 Question	West Lothian Council's proposed response to question
<ul style="list-style-type: none"> • West Approach cycle link • Pilrig Park - Pirrie Street • Link to Morevundale Road 	
<p>8C. We want City Plan 2030 to safeguard and add any other strategic active travel links within any of the proposed options for allocated sites. We also want the City Plan 2030 to include new strategic active travel links which may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or which are identified through this consultation.</p>	<p>See response to Choice 12. While not a preferred option in the City Plan development at Calderwood would give rise to increased car use towards Livingston, Newbridge and Edinburgh via the A71. This in turn, would affect the air quality and traffic impact on the residents of Wilkieston. Measures to assist may include:</p> <ul style="list-style-type: none"> • Quality active travel route towards Newbridge; • Quality active travel route towards the A71 'super cycle highway', perhaps including Ratho; • Quality active travel route towards Livingston; • Ease of road and active travel access, with sufficient parking to access the railway station at Kirknewton. This may require additional parking / bus interchange to be created and for stopping train frequency to be increased; • Frequent quality east – west and north south bus services. • A new cycle route from Balerno down the old railway line towards Kaims Quarry for Kirknewton. This will partially replace the existing NCR 75, which currently uses the increasingly busy Long Dalmahoy Road and the steeply graded Ravelrig Road. <p>As developments with no car parking provision arise, commensurate increase in secure, suitably sized bike storage must be provided. This must be large enough to provide for storage of bike trailers, including child carriers.</p>
<p>Choice 12 – Building our new homes and infrastructure.</p>	<p>The council supports the City of Edinburgh Council's preferred option of delivery of housing within the urban area (Option 1). It does not</p>

Choices for City Plan 2030 Question	West Lothian Council's proposed response to question
	<p>support either delivery through the release of greenfield land (Option 2) or the blended approach (Option 3) in so far as they include an option to extend the Calderwood development at East Calder.</p> <p>The council does not believe that the implications of including an extension at Calderwood, East Calder in Option 2 or Option 3 have been fully or properly assessed. Issues include:</p> <ul style="list-style-type: none"> - An incorrect assumption that the extended development can utilise education infrastructure provided to support the current Calderwood development. - No regard is given to the impact that parental choice may have on existing secondary schools which are already subject to capacity constraints. - No deliverable transportation interventions, to mitigate the development of land in this location are identified to support the allocation. Indeed the transport interventions along the A71 corridor are identified as not being deliverable before 2030. - No regard is given to transport impacts on the village of East Calder and how these could or would be addressed. Roads in and through the village are already under significant pressure from existing large scale development around the village. - A general assumption that infrastructure improvements would be confined to the geographical area of Edinburgh when in fact most impacts will be on infrastructure in West Lothian. - No regard is given to impact on health facilities which would be necessary to support the extended settlement.

Choices for City Plan 2030 Question	West Lothian Council's proposed response to question
<p>Choice 14 – Delivering West Edinburgh</p> <p>14A. We want City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and accommodate the development of a mix of uses to support inclusive, sustainable growth. We will do this through 'an area of search' which allows a wide consideration of future uses within West Edinburgh without being tied to individual sites. Do you support this approach?</p>	<p>Answer 'no'</p> <p>The area of search is of concern to the council. The area of search includes a significant area of land that is adjacent to the City of Edinburgh / West Lothian Council boundary. WLC have concerns about coalescence and impacts on infrastructure in West Lothian for development close to the boundary.</p> <p>Development Planning Circular 6/2013 para 6 states '<i>development plans... should indicate where development should happen and where it should not, providing confidence to investors and communities alike</i>'. Paragraph 7 states '<i>development plans should be kept up-to-date and provide a practical framework within which planning applications can be determined with a high degree of certainty and efficiency</i>'. Paragraph 8 outlines that '<i>proposals should be shown on a map and that LDP's should be engaging documents setting out what places are like, and the specific vision for them</i>'.</p> <p>It is considered that the approach proposed is not Circular 6/2013 compliant. The opportunity to engage in a meaningful manner is diluted by the broad, uncertain, non-specific and unclear approach.</p> <p>WLC would wish to be consulted and engage on specific proposals that the development planning regulations allow for. It is WLC's preference that the West Edinburgh Study and Scottish Government decisions inform the Local Development Plan so that the LDP can provide certainty for WLC as a neighbouring authority.</p>