

DRAFT WEST EDINBURGH PLANNING FRAMEWORK

Overview of consultation responses

INTRODUCTION

1. On 23 August 2002, the Executive, jointly with The City of Edinburgh Council and Scottish Enterprise Edinburgh and the Lothians, published a consultation draft West Edinburgh Planning Framework. It sets out a long-term strategic vision for the area. This report provides an overview of the consultation responses.

2. Over 1000 copies of the consultation draft were distributed to all local authorities, a wide range of public bodies, community organisations and business interests. The document was made available on the planning pages of the Scottish Executive website. Presentations on the contents of the draft Planning Framework were given to community councils in west Edinburgh, The City of Edinburgh Council's Local Development Committee (West) and the Edinburgh Civic Forum. The consultation period closed on 15 November 2002, but a number of responses were received after the closing date. These have all been taken into account.

RESPONSES

3. There were 73 responses in total. These come from a wide range of interests, which can be broken down into the following categories:

Councils	9
Public bodies	9
Business and commercial interests	24
Community organisations and the public	31

4. A full list of respondents is set out in the Annex. Copies of the responses are available for inspection at the Scottish Executive Library (Saughton House, Broomhouse Drive, Edinburgh, EH11 3XD), although two have been submitted confidentially. For an appointment please contact Mr Alan Gold (0131 244 4553). A detailed digest of responses is available on the Scottish Executive Planning Homepage <http://www.scotland.gov.uk/planning/>

MAIN ISSUES

5. The responses have shown very strong support for the strategic aims of the Planning Framework. There was also widespread support for the efforts made to provide a co-ordinated approach to planning and transport in west Edinburgh. It is nevertheless possible to identify a number of issues of concern. These are explained below, together with the Executive's response.

- **A number of responses argued that the Planning Framework does not cover a large enough area. Some would like to see the inclusion of a number of neighbouring sites. Others were arguing for more detailed consideration of wider east central Scotland issues and the redistribution of growth.**

6. *The focus of the Planning Framework is the A8 corridor although the wider impacts have been taken into account. The map showing the main focus of the Planning Framework is indicative only. The National Planning Framework and proposed City Region Plans will be the vehicle for addressing many of the wider strategic issues.*

- **There were also a number of suggestions that the Planning Framework should deal more explicitly with housing issues. The concerns was that the Planning Framework would lead to increased long distance in-commuting**

7. *The Planning Framework focuses on a small geographical area, mainly consisting of Green Belt, transport and employment related land uses. Housing land issues and wider settlement strategy will be for the emerging Edinburgh and the Lothians Structure Plan to address. In response to the point about in commuting, it is important to point out that the priority for the Framework will be to facilitate more sustainable transport options.*

- **Representatives of the local communities have expressed concerns that the local interests and social impacts of proposals have not been properly taken into account.**

8. *The Vision contained within the Planning Framework is for the protection and enhancement of the special qualities that have combined to make West Edinburgh a national asset. The Planning Framework envisages significant investment in public transport combined with continued protection of the Green Belt. Whilst a wide range of other economic, environmental and social issues facing West Edinburgh have been considered as part of the work, the strategic nature of the Planning Framework means that not all the local issues can be addressed in detail. It should also be remembered that any further development in West Edinburgh would still be subject to normal Development Plan and Development Control processes, during which the usual scrutiny and opportunity to get involved will be provided.*

- **The Planning Framework does not at any point mention cycling and walking issues.**

9. *Walking and cycling will form an important component of any sustainable transport solution to West Edinburgh. The finalised version gives more explicit mention of this.*

- **A number of responses argued that the emphasis given to the environment protection and enhancement are not given a high enough priority. It is also argued that the draft misses an opportunity to promote positive enhancement of landscape and environmental quality.**

10. *The Planning Framework is clear in stating that development in West Edinburgh must incorporate the most sustainable principles and high quality design and construction standards. The vision for West Edinburgh includes measures to introduce more environmentally sustainable modes of transport. It also reinforces protection over the Green Belt to 2020 and in promotes its careful planning and management in the longer term. Whilst the principle of promoting the enhancement of the landscape and environmental quality of West Edinburgh is also strongly*

supported, it will mainly be for Development Plans and future work and study to prescribe exactly how this is to be achieved.

- **It has been suggested that the Framework should reflect national policy on reducing road congestion as set out in Scotland's Transport: Delivering Improvements and The City of Edinburgh Council's Local Transport Strategy. Similarly, it has been suggested that the Framework could set general mode share targets.**

11. Policies on congestion and mode share targets exist as a transport policy context for the Planning Framework although more explicit reference has been made to them.

- **Some responses argued that support to further development of the Gyle Centre is inconsistent with stated council policy and NPPG8**

12. The Planning Framework promotes further retail development at the Gyle Shopping Centre consistent with Structure Plan policy and in association with enhanced public transport accessibility and a wider range of supporting leisure and community facilities. Individual planning applications will therefore still need to be considered against stated Council policy and NPPG8.

- **It has been suggested by a significant number of private sector interests that the vision is not bold enough and that postponing development until 2020 is a missed opportunity. It is argued that land release should take place either after transport infrastructure is in place or in parallel with investment in transport infrastructure.**

13. The Scottish Ministers have recognised West Edinburgh as a unique opportunity in Scotland to create an international business location. But this cannot happen until strategic transport improvements are in place first. The priority is to ensure accessibility and competitive advantage is not threatened in the long term by the adverse transport impacts of development already committed. Other considerations are the long lead in time of these transport projects and the labour supply shortages expected in Lothian. It is also necessary to ensure that committed investments elsewhere are not prejudiced through displacement from other core development areas, which is likely as a result of the very large supplies of employment land in Edinburgh and the Lothians.

- **It has been suggested that the Planning Framework does not give a clear enough policy steer on the future of the Airport or Royal Highland Showground.**

14. The Planning Framework recognises the important role played by the Airport and the Royal Highland Showground. The long-term future of this area is being considered as part of a consultation on the Future Development of Air Services in the UK, due to conclude with the publication of an Aviation White Paper in 2003/4. Also relevant are the Rail Links to Airports Study, along with proposals by The City of Edinburgh Council for a West Edinburgh Tram. The Planning Framework simply seeks to safeguard various options for strategic transport improvement at this stage. As decisions on these schemes are made elsewhere and the land use implications become clearer, the Framework will clearly need to be refined and updated.

- **Support for clearer steer on use of planning agreements (Stakeholders, speculators, SRA)**

15. *The standard arrangements for planning agreements as set out in Circular 12/1996 will apply.*

- **There were a number of concerns and suggestions related to next steps and the need for stronger commitments by the Executive on transport delivery, further study and masterplanning.**

16. *The Scottish Ministers are committed to the implementation of the Vision for West Edinburgh. They recognise that addressing the issues and realising the opportunities presented in West Edinburgh will not be achieved with publication of the Planning Framework alone. An early task will be to reflect the Vision into Development Plans. Good progress is also being made on transport delivery. The finalised version gives a clearer steer on action required to implement and deliver the Planning Framework, including an undertaking to review and update the Planning Framework in light of progress with transport delivery and the Aviation White Paper.*

- **There were several requests from respondents to be included in the Stakeholders Advisory Group.**

17. *The Stakeholders Advisory Group was set up to inform the early stages of the drafting process. It was made up of key public and private sector interests operating in the area. A decision was made to meet speculative developers and wider land holding interests bilaterally on request. Comments were also invited on a consultation draft and all those who responded were also invited to a seminar. The Scottish Executive welcomes the efforts made by all the stakeholders to engage positively in the process and is keen to maintain dialogue with them as work to implement the Vision for West Edinburgh continues.*

Annex: List of Respondents

Association for the Protection of Rural Scotland	Leslie Mr David
AWG Residential	Light Rail Scotland
AWG Residential and Barratt East Scotland Ltd	Lothian Buses
BAA Scottish Airports and BAA Edinburgh Airport	Mactaggart and Mickel Ltd
Blair-Fish Mr John	Meadowfield Developments Ltd
Bryant Homes	Midlothian Council
Byrne Mr Chris	Moorfield Group Ltd
CALA Homes	National Association of Cyclists
City of Edinburgh Council	New Edinburgh Ltd
Clerical Medical Investment Group Ltd	Park Lane Developments
Cockburn Association	Queensferry and District Community Council
Corstorphine Heritage Centre	Premier Property Group Ltd
Craiglockhart Community Council	Renfrewshire Council
Cramond Association	Roberts Associates
Currie Community Council	Royal Fine Art Commission for Scotland
Dundas and Hopetoun Estates	Royal Highland Agricultural Society of Scotland
Dundee City Council	Scottish Association for Public Transport
East Lothian Council	Scottish Council for Development and Industry
EDI Group Ltd	Scottish Enterprise Edinburgh and the Lothians
Edinburgh Airport Amenity Group	Scottish Natural Heritage
Edinburgh Green Belt Network	SecondSite Property Ltd
Falkirk Council	Scottish Environmental Protection Agency
Ferrymuir Residents Association	South Lanarkshire Council
Fife Council	SPOKES
Friends of the Earth Scotland	Stirling Council
FSH Airport (Edinburgh) Services Ltd	Smith, Margaret MSP & Barrett, John MP
Garden History Society	SUSTRANS
Glackin Mr John	Strategic Rail Authority
Glasgow and Clyde Valley Structure Plan Manager	University Superannuation Scheme Ltd
Glasgow City Council	Watchman Mr John
Health and Safety Executive	Waterfront Edinburgh Limited
Holtum Ms Eileen	Watson Mr R Michael
Homes for Scotland	West Edinburgh Ltd
International Business Gateway	West Lothian Council
Keppie Planning	West Edinburgh & District Community Council
Kerr Mr Alex	Strategic Rail Authority
Land Securities	

DRAFT WEST EDINBURGH PLANNING FRAMEWORK

Digest of responses

Respondent	Summary of Representation
General Issues	
<p>The City of Edinburgh Council, East Lothian Council, Dundee City Council, Falkirk Council, West Lothian Council, Glasgow City Council, Renfrewshire Council, South Lanarkshire Council, Stirling Council, Glasgow and Clyde Valley Structure Plan Manager</p>	<p>General support for the strategic aims of the Planning Framework and the vision for managing growth and safeguarding accessibility.</p> <p>Renfrewshire, Stirling and South Lanarkshire Councils want to see recognition that solutions to West Edinburgh's transport problems cannot simply be found in Lothian and want more consideration of wider economic, land use and transport implications of the Vision.</p> <p>East Lothian Council welcomes endorsement of the emerging Structure Plan strategy, although considers many of the aims and objectives of the WEPF could be achieved through the more equal distribution of employment land throughout Lothian.</p> <p>Glasgow City Council argues that brown field business locations already served well by public transport (e.g. Broomielaw) need to be promoted, instead of green field development in areas with identified labour shortages.</p> <p>Stirling Council and Renfrewshire Council consider that the Framework should be set more clearly within a national context.</p> <p>Glasgow and the Clyde Valley Structure Plan Manager consider that the vision will induce need for long distance commuting. This will counter efforts to reduce congestion and safeguard accessibility.</p>
Fife Council	<p>Fife Council considers that the issues in west Edinburgh have been considered in isolation from the surrounding council areas. The Framework should address the relationship between the Lothian and other Structure Plans and is therefore in conflict with the proposals contained in the Review of Strategic Planning (which calls for planning at a city region level) and does not represent a co-ordinated approach to planning as intended.</p>
BAA Scottish Airports and BAA Edinburgh	<p>Strongly welcomes the Planning Framework as a way of help protecting the national asset of Edinburgh Airport and the surrounding area. It is also regarded as being an excellent model for taking forward the outcomes of the Aviation White Paper.</p>
Friends of the Earth, Queensferry and District Community Council, Fife Council, Scottish	<p>New economic development should be directed to areas outwith Edinburgh where there is greater availability of labour, brownfield land and transport capacity.</p>

Association for Public Transport (SAPT)	
Scottish Natural Heritage	SNH would like to see greater linkages and cross referencing to the NPPG series and clarification as to how the WEPF relates to the National Planning Framework.
Edinburgh Green Belt Network	<p>Promotes the more equitable distribution of growth around Scotland and questions the sustainable development credential of meeting demand for economic development wherever it arises, and where it will erode valuable environmental assets.</p> <p>Is generally concerned that the document is promoting very significant undermining of green belt policy and that uncertainty over the scale and location of green belt release is causing alarm.</p>
AWG Residential, Barratt, CALA, Dundas Estates and Hopetoun Estates, Mactaggart and Mickel, Homes for Scotland, Park Lane Developments, Scottish Council for Development and Industry, Dundas Estate together with Hopetoun Estates interests	<p>Housing land supply should form part of the vision. The Framework will increase long distance commuting in an area of labour supply shortages, which conflicts with national planning policy guidelines and sustainable development objectives.</p> <p>Homes for Scotland is concerned the geographical and topic focus is too narrow and doesn't consider that the document provides a basis for a sustainable settlement pattern.</p> <p>The Scottish Council for Development and Industry suggest that it is crucial to sustain a labour force through the provision of housing, and more strategic direction should be provided on this.</p>
SUSTRANS, Chris Byrne, John Blair-Fish, Eileen Holttum, National Association of Cyclists, EDI, SPOKES, John Glackin, David Leslie	Concerned that the Framework does not recognise or promote walking and cycling use and provision.
West Edinburgh Community Councils, (South Queensferry and district, Kirkliston, Corstorphine, Ratho and District, Currie, Drumbrae, Drylaw/Telford and the Cramond Association)	Would like to see greater recognition given to community needs and local considerations, in particular air and noise pollution, heritage, environment and services.

Scottish Council for Development and Industry	Supports investment in West Edinburgh as a driver for the economic success of Scotland. Recognises that significant investment in transport infrastructure is urgently needed.
Margaret Smith MSP and John Barrett MP	<p>Welcome the strategic approach being adopted in dealing with the big issues affecting the area, although is concerned that no representatives of the thousands of people that live in the area were included on the Stakeholders Advisory Group. Suggests local representation on the Group and on the proposed Travel Plan Organisation.</p> <p>Generally concerned that there is little mention of social impact further development may have on the area.</p>
Introduction	
West Edinburgh Community Councils	Concerned not to have been included in the stakeholders advisory group and would like to see members of the Stakeholders Advisory Group listed.
Premier Property Group Limited	PPG should be considered to be one of the key stakeholders. (map of land in their ownership included).
Edinburgh Green Belt Network	Wants to see some reference in paragraph 2 to the fact there are problems associated with the overheating of the Edinburgh economy.
Dundas Estates together with Hopetoun Estates	As a major landholder in the area, the Group should be included on the Stakeholders Advisory Group.
West Edinburgh – The Place	
South Lanarkshire Council	Would like to see the document cover a wider area and deal with the housing market and transport implications for South Lanarkshire.
Ferrymuir Residents	Concerned that South Queensferry has been omitted from the plans, in particular the Ferrymuir Development site (class 4), the impact on the A8000 of this and the Rosyth Continental Ferry Service.
Fife Council, Queensferry and District Community Council	Fife should be more specifically included in the framework, in particular, present and potential links, the Rosyth-Zeebrugge ferry and cross-Forth movements.
Homes for Scotland	Would support a wider area being covered, including Riccarton, South Queensferry and east West Lothian.
CALA Homes Ltd, Mactaggart and Mickel	The study area is too narrow to explore the broad sub-regional issues being considered. It should therefore cover a wider area, including the land to the south at Riccarton and Currie, as well as to the east of West Lothian and south of the Forth Bridge and deal with transport links.
Fife Council	Fife Council wants to see consideration of the cross forth dynamic in transport, labour supply and other strategic land use issues.

Dundas Estates together with Hopetoun Estates (Submitted by PPCA)	The study area should be extended to include Kirkliston and an area north of the Airport. Table 1 should be updated to reflect the fact that there is permission on place for a future rail halt at Turnhouse.
Mr Alex Kerr	The Framework needs to be set within a context of a wider central belt strategy (map enclosed).
The Garden History Society	In order to judge the capacity of the landscape to accommodate development the Framework should take into consideration the likelihood of other strategic areas being released for development, in particular the West Lothian Core Development Area/ any new settlement in West Lothian.
The Cockburn Association	The boundary should be extended to include the Heriot-Watt University Campus. Hermiston Gait Business Park could provide a natural escape valve for demands on office space.
West Edinburgh Ltd	West Edinburgh Ltd questions the potential for the former RAF Turnhouse site to be able to support up to 70 000sq m of commercial floorspace, particularly in view of the constraints on the Maybury Junction. Wants to see the main focus of the Framework enhanced to embrace the land around Turnhouse/Turnhouse road in view of its strategic importance for allowing access to the proposed Turnhouse 'Airwest' site and its potential for use class 5 and 6 development.
AWG Residential and Barratt East Scotland Limited	The study area is too narrow to explore broader sub-regional issues and should be expanded to include the West Lothian CDA, encompassing Winchburgh and East Broxburn. This should particularly look at housing land requirements and transport links.
Royal Highland and Agricultural Society of Scotland	Table one should be amended to read £80 into the local economy and £200 into the national economy. Also, The City of Edinburgh Council and SEEL have helped promote the site as 'Scotland's National Showground'.
Light Rail Scotland	Concerned at the lack of progress in transport schemes and that quoted dates appear to be slipping.
Scottish Association for Public Transport	The main focus of the area and tables should be extended to include the Heriot-Watt Campus and an area adjacent to the Edinburgh Bypass as key development sites. The latter to meet demand for housing.
West Edinburgh – A National Asset	
David Roberts Associates	The economic potential and importance of west Edinburgh is understated. The Framework should explain the international significance of the area and its linkages with the Scottish economy.
Waterfront Edinburgh confidential	
Secondsite (formerly Lattice) Properties Ltd	Considers Edinburgh Waterfront to be a 'national asset' also.

EDI Group Limited	EDI wants to see paragraph 12 expanded to give more emphasis to Ratho as a location of housing development: <i>'Residential expansion of Ratho is supported to meet the demand for housing on the west side of the city and to provide a valuable base to sustain enhanced social and commercial facilities for the village.'</i>
Edinburgh Green Belt Trust	Wants to see the 'strategic role' of the Green Belt defined (para 15 and elsewhere).
Royal Highland and Agricultural Society of Scotland	RHASS would like to see an additional bullet added at paragraph 15 to recognise the future of the Showground in the national interest: <i>'need to ensure that the continued operation, and future development of the Royal Highland Centre is not compromised by the allocation or safeguarding of land for other uses'.</i>
The Garden History Society	Framework should identify all environmental assets of national and regional importance – preferably on a map.
Background Issues, Pressures and Constraints	
The Cramond Association	Suggests the inclusion of a sentence at the end of paragraph 21 of the framework: <i>Measures to minimise the impact of aircraft movements and related noise on the environment of local communities will also be required</i>
John Watchman	<p>The Planning Framework does not make reference to NPPG 17, Edinburgh Local Transport Strategy or <i>Scotland's Transport: Delivering Improvements</i>.</p> <p>The Framework should encourage incorporation of the LTS into development plans, in line with NPPG17.</p> <p>Policy on containing traffic growth and tackling congestion is set out in <i>Scotland's Transport: Delivering Improvements</i>. The Framework would benefit from more explicit cross-referencing to it.</p> <p>Reference should be made to wider strategic transport initiatives including Waverley Station and Central Edinburgh Traffic Management Proposals.</p>
David Roberts Associates	<p>Also, economic demand is not simply based on financial and business services but also includes tourism, retail, culture and technology based businesses.</p> <p>Growth potential should not simply be based on a sum of current known and anticipated development. Rapid change and global competition have made this assumption outdated.</p>
Scottish Council for Development and Industry	Accepts and agrees with the suggested scale of projected employment growth.
Scottish Association for Public Transport, Glasgow City Council, BAA	Challenges the basis of the Airport Growth predictions being used for the Air Services Consultation Document and their applicability to the Planning Framework and sustainable development objectives.

SEPA	<p>Would like to make further comments in relation to the environmental issues section (paragraphs 21 and 22)</p> <p>Flooding - New development should not exacerbate flooding in the Almond and Gogar Burn catchments – a flooding strategy may be required.</p> <p>Water Quality – Lack of acknowledgement that quality is already adversely affected by development in west Edinburgh. Strategy required to ensure there is no further deterioration in water quality or ecological value of watercourses, under provision of the EC Water Framework Directive.</p> <p>Transport Infrastructure – Second runway etc would result in culverting and the loss of flood plain, increasing the risk of flooding and pollution surface run off which. It is generally SEPA's policy to avoid culverting.</p> <p>The environmental focus of the vision could be enhanced through some positive support for a landscape framework in advance of development. It could identify areas for protection, areas of habitat creation such as woodland and areas for public access and amenity.</p>
Fife Council	Discussion of environmental and technical constraints is brief and does not seem to recognise the cultural heritage value of the area.
Edinburgh Green Belt Network	Wants to see an environmental/landscape capacity study commissioned to help understand environmental constraints and environmental capacity.

The Vision for West Edinburgh

Edinburgh Green Belt Trust, West Edinburgh Community Councils, Currie Community Council	Generally concerned that the vision is unreasonably skewed in favour of development over environmental protection and enhancement, in particular, natural and cultural heritage, noise and air pollution.
Margaret Smith MSP and John Barrett MP, West Edinburgh Community Councils, Friends of the Earth, New Edinburgh Ltd, Craiglockhart Community Council	There should be no more development committed to west Edinburgh until strategic transport proposals are in place.
The Association for the Protection of Rural Scotland, Currie Community Council	The document to read like a development charter and should be redrafted to avoid development of any non-conforming uses in the green belt.

Moorfield Group Ltd	As owners of a site at Edinburgh Park the Moorfield Group supports the aims and vision contained in the Planning Framework.
Mr Alex Kerr	Concerned that the national interest (paragraph 23) is generally only of local significance.
West Edinburgh Ltd	West Edinburgh Ltd considers that the draft Framework fails to fully grasp the opportunities presented by west Edinburgh.
Scottish Natural Heritage	SNH would like to see the policy objectives in paragraph 23 extended to include a greater commitment to sustainable development, for example, reducing traffic pollution, provision of more sustainable transport modes and protection and enhancement of landscapes and biodiversity.
Royal Highland and Agricultural Society of Scotland	RHASS suggests that bullet point 4 at paragraph 23 be amended to include <i>'the introduction of rail links to Edinburgh Airport and the Royal Highland Centre to improve accessibility and reduce journey times from other parts of Scotland and the UK'</i> . RHASS would also like to see an additional bullet added at paragraph 23 to recognise the future of the Showground in the vision: <i>'continued development of the Royal Highland Centre'</i> .
The Edinburgh Airport Amenity Group	Indicates that there is no policy on aircraft noise and therefore the following paragraph should be added to paragraph 23: <i>'The effect of aircraft noise (and other effects) on residential amenity (both existing and proposed) will be fully taken into account when deciding all proposals to develop facilities at or in the vicinity of Edinburgh Airport.'</i>
David Roberts Associates	The Vision reads as one where the green belt is sacrosanct as if this was the only arbiter of a development strategy. It rationalises proposed developments with Executive civil service timidity and political fear of controversy. It is not creditable to assume that the future will mirror the past, threaten few interests, fit with the Structure Plan and then call that a serious contribution to the National Planning Framework.
Mr R Michael Watson	Mr R Michael Watson sets out a detailed proposal for heavy and light rail links to the Airport.
Margaret Smith MSP and John Barrett MP	Welcomes the Executive's strategic vision but is concerned that the proposed transport infrastructure should come forward independently of road user charging proposals in Edinburgh.
Scottish Association for Public Transport	The national interest should include the integration of rail and bus networks into land use plans, reduction of congestion by 2006 and priority introduction of road pricing in central and west Edinburgh.

The Planning Framework

Royal Highland and Agricultural Society of Scotland	RHASS submits that the planned growth of Edinburgh Airport should not be allowed to blight the continued expansion and rationalisation of car parking and other support services of the Showground and wider Ingliston area. The Framework should require that the Airport works together with the RHS to provide for non-operational support services related to expanded Airport activity within the wider Ingliston estate. RHASS supports the reinforcement of the strategic role of the Green Belt through removing the RHS and Airport from it and making the boundaries more recognisable and defensible. This would also reinforce policy support towards their continued development.
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<p>Secondsite (formerly Lattice) Properties Ltd</p>	<p>Supportive of improved transport links although would like to see more clarity and certainty over timing and funding arrangements in the finalised version.</p> <p>Would like to see the scope explored for an extended tram loop from Newbridge to Queensferry and along Queensferry Road to North Edinburgh Tram link.</p> <p>Keen to see the GB protected until at least 2020, and priority given to core SP development areas.</p>
<p>Strategic Rail Authority</p>	<p>SRA supports Edinburgh Park Railway Station and the provision of heavy rail links to Edinburgh and Glasgow Airports.</p> <p>Improved access to the rail network from key development sites is supported in principle but this should not compromise the operational efficiency of the railway. The SRA therefore supports more explicit guidance on the role of developer contributions towards providing better links to rail facilities and associated improvements to services and facilities.</p>
<p>Waterfront Edinburgh confidential</p>	
<p>Light Rail Scotland</p>	<p>Consider that the WEBS proposal should be abandoned, freeing c£10million for immediate investment in the tramway.</p> <p>The Ingliston P&R should be integrated into light rail proposals.</p>
<p>The City of Edinburgh Council</p>	<p>Stresses the fundamental importance of securing commitment from the Scottish Executive for transport improvements consistent with its own Local Transport Strategy.</p> <p>Recognises the potential need for improved road links around the Airport and between west Edinburgh and the Waterfront, although accepts that this may need to be resolved after the outcomes from the forthcoming Aviation White Paper are known.</p> <p>Support the principle of developer contributions to transport infrastructure although considers that the limited amount of development being proposed will not allow for much scope for these.</p> <p>Supports a statement in the Framework for the promotion of sustainable construction techniques.</p>
<p>Glasgow and the Clyde Valley Structure Plan Manager</p>	<p>Proposal to use GB designation to safeguard a strategic reserve of land is confusing in terms of the stated objectives of the GB, contradicts commitment given to GB elsewhere and could lead to land speculation.</p> <p>Wants to see a commitment contained in the document towards a balanced development of both Edinburgh and Glasgow Airports.</p>
<p>Scottish Association for Public Transport</p>	<p>Supports the introduction of mode share targets and road pricing to underpin the spatial strategy.</p>

Friends of the Earth	<p>The Framework should also set modal shift targets.</p> <p>Applications for development should be accompanied by an ecological footprint analysis, including resource use and carbon dioxide emission projections.</p>
Bryant Homes Scotland	<p>Concerned that the national interest in West Edinburgh is being compromised through simply restating existing draft Structure Plan policy. Development in west Edinburgh should be promoted now and not in 20 years time. Bryant Homes considers that the Framework should be clearer on commitments and timescales for transport investment</p> <p>Housing provision is considered to be essential to the sustainable development of west Edinburgh and considers that the strategy will lead to significant long distance commuting.</p>
Glasgow City Council	<p>There should be an additional heavy rail station, on the Glasgow-Edinburgh line, to provide an interchange with the proposed LRT line at Newbridge for traffic from the west.</p>
West Edinburgh Community Councils	<p>The Community Councils would like to see the location of the proposed 1000 houses at Newbridge/Kirkliston/Ratho being defined more clearly</p>
Scottish Council for Development and Industry	<p>NPPG 2 sets out the importance of HQ buildings and would like to see more explicit support for confirmed HQ buildings the West Edinburgh in line with the caveats set out in paragraph 24.</p>
Royal Fine Art Commission for Scotland	<p>RFACS submits that safeguarding areas of Green Belt for future development is contrary to the development plan and national planning policy guidelines. RFACS would like to see a more positive commitment to improving the landscape and appearance of the Green Belt/A8 corridor.</p>
Meadowfield Developments Ltd	<p>Concerned that the Planning Framework is a missed opportunity for realising the economic potential of the A8 corridor.</p> <p>Wants to see Edinburgh Airport designated as a core development area in the event of a second runway being developed and the cross runway being closed.</p> <p>The forecast floorspace at Turnhouse (table 3) is not considered to be viable</p> <p>Overall the Planning Framework shows bias towards class 4 uses in spite of demand for class 5 and 6 uses e.g. at Turnhouse.</p>
New Edinburgh Ltd	<p>Supports the principle of fair and reasonable contributions being obtained from developers for public transport improvements.</p>
Premier Property Group Ltd	<p>Disappointed that the framework does not place West Edinburgh in a European context and that development is not promoted before 2020, even in the event of transport links being in place. Overall the Framework is too conservative.</p>

	Private investment in improved transport infrastructure may compromise more than a development levy or surcharge although should be based on a partnership approach.
West Lothian Council	Wants to see more detailed costings of transport infrastructure proposals, together with an indication of how they might be funded. Wants to see the proposed expansion of the Gyle Centre (Table 3) promoted in line with NPPG 8 and the sequential test.
International Business Gateway Scotland	IBG supports the strategic aims of the Framework, although does consider that the potential for further international headquarters buildings is being restricted until at least 2020 and that this will serve to reinforce the gap in Scotland for planned sites, attractive to and capable of accommodating internationally competitive economic development. Supported by a qualitative assessment of land supply for this type of development, IBG would like to see references to 2020 and 2030 removed so that short-term opportunities for headquarters developments are not compromised. IBG supports the early and sustained step change in levels of transport investment in west Edinburgh are needed and considers that development in the short term can help deliver these. Would like to see more clarity on transport proposals, including the means and timing of delivery. IBG considers that the Framework represents an opportunity to promote the environmental and visual appearance of the A8 corridor and Airport.
FSH Airport (Edinburgh) Services Limited	Framework does not provide a clear basis for making decision of individual applications and leads to confusion over a multitude of strategic options. The Vision should not preclude development beyond the next structure plan period, particularly if the public and private sectors work together to integrate development and transport provision. Would welcome an expanded stakeholders advisory group on an accountable and formal footing to discuss how this might happen.
Mr David Leslie	Land around the airport, especially at Turnhouse, should be safeguarded for light rail infrastructure rather than be swallowed for airport associated uses.
Lothian Buses	Various comments on the schedule of development to 2020 Sighthill/South Gyle: These areas cannot be ignored as an when further developments arise, in preference to further expansion 'out of town' Edinburgh Park: Area suffers from congestion, illegal parking, lack of traffic regulation/enforcement, regular accidents causing difficulty in maintaining bus timetable. These problems need to be addressed.

	<p>The Gyle Centre: Any expansion should not be at the expense of any re-generation of the City Centre. Suffers from congestion problems relating to the Edinburgh Park, especially at the start finish working times of the day. Urgent need for radical improvement to the bus terminus facilities.</p> <p>Gogarburn Hospital: Opportunity exists at the initial planning stage to ensuring that public transport access is fundamental to the redevelopment of this site. If not, it will contribute to further deterioration and undermine the overall success.</p> <p>Edinburgh Airport: Urgent need for an improved bus departure point so it is immediately accessible from the public building. Too far away at present.</p> <p>Royal Highland Showground: This development will undoubtedly be influenced by the decisions regarding the future growth of the airport. Transport strategy should therefore be wholly complimentary to the development and the A8 corridor.</p> <p>Newbridge: Considerable scope for the regeneration of this area, and the converging motorway system. Transport access issues should not be marginalised in favour of housing developments.</p> <p>Tram: Disappointed that the benefits to be gained from segregated tram alignment will be at the expense of WEBS. Is not a cost effective way forward and removes any advantage that will have been gained over a private motorist, by taking away the flexibility that only a bus can provide.</p>
AWG Residential confidential	
Clerical Medical Investment Group Ltd	Hermiston Gait Retail Park will next year have an excellent transport link with the new Edinburgh Park railway station. Therefore, this area should be given similar treatment in the Planning Framework to the Gyle Centre, as a location that offers significant opportunity for retail expansion in conjunction with planned public transport improvements.
Health and Safety Executive	The Framework should make reference to the existence of two high-pressure pipelines in the area. Map included.
Vince Stewart	<p>Disappointed that the document offers little in the way of economic development potential, with the exception of Gogarburn.</p> <p>It also does little to remove uncertainty over the balance of land uses between the Airport and Showground or serve as a basis for development control. Sites around Eastfield Road are being blighted.</p> <p>Framework does not set out a requirement for an Airport Showground Masterplan. Does this mean that there is no longer any requirement to prepare this? An adopted LP for the area is unlikely to be in place until 2006</p>
The Cockburn Association, Dundas Estate together with Hopetoun Estates	The finalised Framework should clearly define the preferred route of the heavy rail links to the Airport, therefore avoid blight and give certainty.

with Hopetoun Estates interests	
EDI Group Limited	<p>EDI would like to see reference to the Sighthill and South Gyle development areas in Table 3 expanded to include a requirement that: <i>'This intensification of development is subject to effective mitigation of adverse transport impacts'</i> in order to be consistent with the reference to Edinburgh Park.</p> <p>EDI notes the support given to further retail development at the Gyle Shopping Centre in Table 3 but wants to see this made subject to impact on the City Centre, Wester Hailes and other 'town centres'.</p>
Land Securities	<p>Opposes support for further expansion of the Gyle shopping centre in that it appears inconsistent with both stated SE and The City of Edinburgh Council Development Plan policy and would not be subject to sequential testing.</p> <p>Also states that the Gyle will have expanded to around 36,000 sq.m. after current permission are implemented.</p>
The Cockburn Association	<p>Considers treatment of environmental issues to be the weakest element. The Green Belt plays a critical role in the urban form of Edinburgh, which needs to be recognised. The Framework offers no guidance as to how the greenbelts strategic role can be reinforced. The role of the A8 as a key gateway into the city with prime views needs to be reinforced, for example, planting of trees, landscaping and views are important elements within this.</p> <p>Would like to see the document set out a modal split targets for airport traffic to 2007 and 2015.</p>
BAA Scottish Airports and BAA Edinburgh	<p>Would like to see the Framework recognise more clearly the development of the Airport as a priority over surrounding land uses.</p> <p>Considers that early action and investment is needed to address the key challenge of mitigating the transport impact of development already committed.</p> <p>Considers the key policy priorities to be enhanced global connectivity and improved surface accessibility.</p> <p>Framework should make reference to the targets in the Transport Delivery Report of reducing congestion by 2021 to 2001 levels. Improved road access to the Airport will be a crucial part in achieving this.</p> <p>The Framework needs to be more explicit on transport delivery and timing.</p> <p>The Framework should be more specific in safeguarding future operational requirements, including a third runway.</p> <p>Would not want to see delivery of improved transport delivery compromised through a commitment to Green Belt protection until 2020. Providing transport is in place first, then the timescale should become irrelevant.</p>

	<p>The Royal Highland Showground expansion would severely prejudice the ability of the Airport to acquire and develop the land it needs to grow, thereby limiting its role as a national asset. If the opportunity to set priorities is lost, the value of the Framework is compromised. It is accepted however, that it may be necessary to postpone a decision on this until the outcome of the Aviation White Paper.</p> <p>Query the basis of Table 3, which appears to constrain airport growth to 15 million passengers per annum by 2020.</p> <p>The finalised Framework should reflect the findings of the SE/SRA Rail Links Study.</p> <p>BAA is extremely concerned about road capacity and supported strategic as well as local road improvements, in particular Motorway access and to the cargo terminal at Turnhouse. Road enhancements should be an unconditional requirement of the planning framework (para 23).</p> <p>The Framework should give support for improved bus services.</p> <p>Note a transport interchange is proposed on BAA land. This should not compromise the operational efficiency of the Airport and would have to be commercially viable to be operated by BAA.</p> <p>BAA wonder how the Park and Ride facility at Ingliston relates to the Airport interchange and are concerned it would increase congestion on Eastfield road to the detriment of Airport accessibility</p>
Scottish Natural Heritage	<p>SNH would like to see dates given for the introduction of transport improvements. It also strongly recommends that new transport infrastructure needed to facilitate access to Edinburgh Airport is put in place before growth takes place.</p> <p>SNH points out that a second runway at Edinburgh Airport would require significant culverting of the River Almond, to the significant detriment of its ecological value. This would need careful considered in the context of NPPG14 and the Water Framework Directive.</p> <p>SNH considers the implications for the Green Belt to be unclear. It suggests that the Framework be clarified to state that future green belt development should not undermine the strategic role of the green belt (paragraph 30).</p> <p>SNH would like recognition given to the scope for the Framework to reinforce the strategic role of the Green Belt, for example, through promoting improvement of landscape and biodiversity assets.</p>
Stirling Council	<p>SESTRAN partnership has not been acknowledged in the framework.</p>
Homes for Scotland	<p>Questions the purpose of the framework in that it does not promote any and land release until after 2020.</p> <p>Distinction between class 4 (of which there seems to be surplus land) and world class economic development is confusing and needs to be clarified.</p>

University Superannuation Scheme Ltd	The framework states that further regeneration and development for the area cannot go ahead until transport improvements are in place. A tangible link between the granting of planning consents for the development in the area and the outworking of transportation improvements would be supported. Scope for these developments to come forward in tandem with transport improvements could be provided through a phased approach to development.
Action Required	
Bryant Homes	Bryant Homes is concerned that the 'Action Required' does not set out any clear requirements for the Development Plan and questions the relevance of the Planning Framework to the development planning system.
Scottish Council for Development and Industry	Would like to see the outcome of the Aviation White Paper reflected in the finalised Planning Framework.
Vince Stewart	Framework does not set out a requirement for an Airport Showground Masterplan. Does this mean that there is no longer any requirement to prepare this? An adopted LP for the area is unlikely to be in place until 2006
BAA Scottish Airports and BAA Edinburgh	Action required is not enough to deliver the vision. For example, reference could be made to the action required by the Executive and the Council in delivering transport improvements rail links etc. Other requirements could include developing firm recommendations for managing traffic (based on a comprehensive transport study) and the establishment of a Travel Plan organisation.
Premier Property Group Limited	The Planning Framework should be supplemented with a masterplan for the area, which could serve as a marketing tool for inward investors in Scotland.
Scottish Council for Development and Industry, EDI , SPOKES	The Framework should give more explicit guidance on the use of Section 75 planning agreements as a way of ring fencing contributions towards public transport improvements. Other suggestions include a dedicated 'fund', including the contributions to maintain and enhance public transport infrastructure in the area.
SEPA	Requires planning authorities to input safeguards to prevent undesirable development in the area, whereas a more proactive approach would require that they start planning the type of environmental framework (similar to a large-scale masterplan) that could be adopted.