

Representation to Proposed Midlothian Local Development Plan

In Support of
Whitehill, Midlothian

Prepared by
Clarendon Planning and Development Ltd

On behalf of
Lawfield Estate

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Introduction

This **representation to Midlothian Council's Proposed Local Development Plan (LDP)** has been prepared by Clarendon Planning & Development Ltd on behalf of Lawfield Estate and follows previous representations to the Council's Call for Sites exercise in March 2012 and LDP Main Issues Report in August 2013.

The representation **objects to the non-inclusion of land for residential development at Whitehill Site VR8 (reference as per the Council's LDP Main Issues Report Development Site Assessment).**

This submission seeks to reiterate the merits of the site for housing and its deliverability in the context of the identified housing land supply shortfall within Midlothian.

In this respect, it is considered that the LDP as it presently stands will not meet the Council's obligations of providing a 5 year effective housing land supply and SESplan strategic requirements and therefore additional housing sites must be identified.

Proposal Background

The proposed site is located on the south-western edge of Whitehill, a village located immediately south-east of Dalkeith.

The site extends to approximately 2.5 hectares and comprises agricultural land forming the undeveloped southern edge of the village main street (the minor Pathhead to Dalkeith road via Edgehead), bound to the west by a modern housing development ('Witholm'), the east by a water treatment plant with agricultural land extending to the south.

The extent of the proposal is reiterated within this document but in summary there is scope for approximately 12 detached plots on the south-western side of the village to create a high quality, streetscape with associated landscaping and design allowing for views through to the south-west.

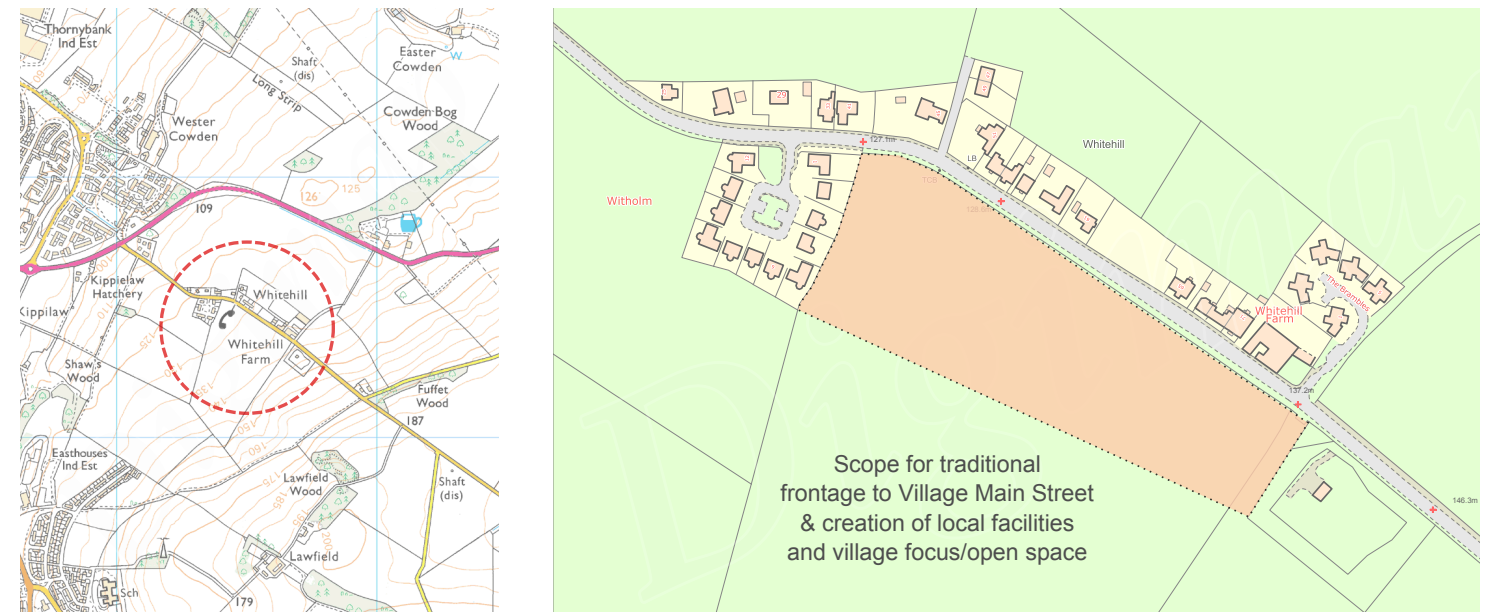


Figure 1 - Whitehill Location & Context

LDP Vision

The LDP Vision Statement is broadly supported in terms of delivering a successful and growing area.

In particular, it is agreed that the South East of Scotland is the key growth area for the country and “Midlothian will play its part in this growth, securing long-term social, economic and environmental benefits”.

Housing is the key growth driver for Midlothian which will continue to absorb unmet demand from Edinburgh. The opening of the Borders (Waverley) rail line in September (2015) will reinforce this role for the area and Midlothian must therefore ensure a generous supply of housing land.

Additionally, it is noted that the Vision Statement requires that, “new development shall be of high quality, balancing a desire for good contemporary design with respect for the area’s heritage”. In this respect, the proposal at Whitehill would complete village streetscape on its southern edge and provide housing location choice.

However, **to realise this Vision Statement, the LDP will require to allocate additional housing land**, as detailed hereafter.

LDP Aims & Objectives

The LDP Aims are generally supported although it is clear that in terms of Aim No.1 - “to implement the requirements of the Strategic Development Plan for South East Scotland (SESplan)”, **the LDP requires to allocate additional housing land as both 5 year effective land supply and SESplan targets will not be achieved.**

In terms of the LDP’s environmental objectives, it is considered that the proposal would accord with requirements to “avoid coalescence and the loss of community identity” which is a key consideration within the A68/A7 strategic growth area where coalescence has already emerged through proposed housing between Mayfield, Newtongrange and Gorebridge.

Proposals for new structural planting and open space will ensure accordance with objectives to “enhance the countryside and rural environment, the landscape setting of towns and villages, and open space generally” and “ensure careful integration of new building into the landscape”.

As illustrated on **Figure 2**, Whitehill, whilst a village, is well located in terms new rail stations at Newtongrange and Eskbank as well as amenities and services and will therefore accord with objectives to “direct new development to locations which minimise the need to travel, particularly by private car”. Additionally, an existing bus service connecting Edinburgh runs through the village with a bus stop opposite the site.

The proposal would contribute to LDP social objectives, primarily, to “mix of housing” but also, through suitable design, “improve access opportunities to public open space and to Midlothian’s countryside”.

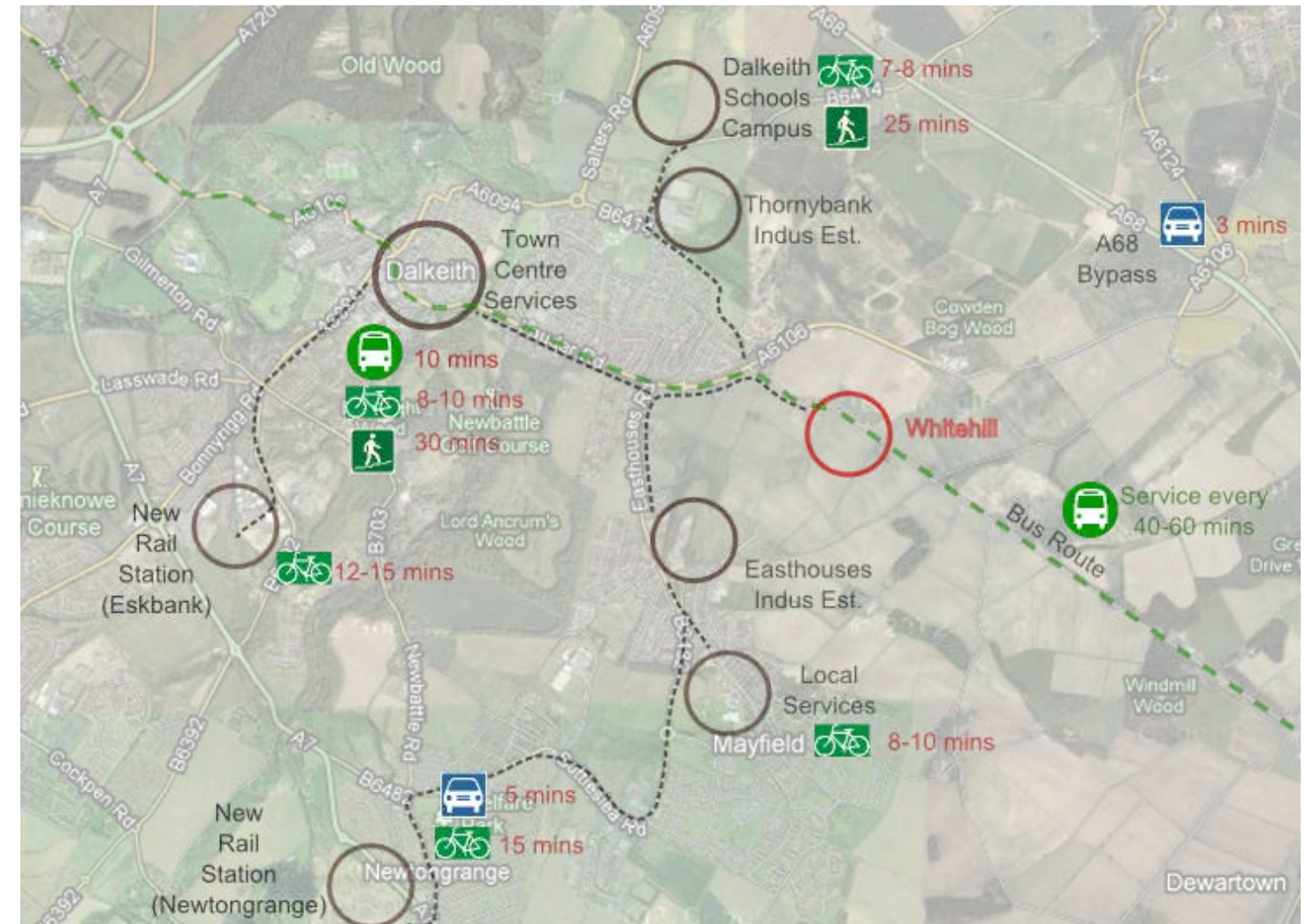


Figure 2 - Whitehill Connectivity

National & Regional Context

It is noted in Paragraph 2.1.2 that the LDP states that, “the Plan takes full account of SESplan’s spatial development strategy and strategic policy framework and, where there is no conflict in interest or intent, the provisions of the Third National Planning Framework and revised Scottish Planning Policy are given due consideration.” The extent to which the plan accords with SESplan and SPP is questioned with regard to housing land supply in terms of 5 year effective land supply and SESplan targets as outlined hereafter.

The LDP’s requirement to accommodate growth within the strategic development areas of Shawfair, A7/A68/Borders Rail Corridor and the A701 Corridor is supported. The need to bring forward a generous supply of housing land within these locations must be a focus for the LDP, as required by SPP.

Existing Development Commitments

The need to deliver existing committed development from previous Local Plans is clear if housing land requirements are to be achieved.

LDP Appendix I sets out the capacity of committed sites and the extent of completions to date. This clearly demonstrates the lack of delivery on many of the sites, i.e.

- Pre-2003 Midlothian/Shawfair Local Plan sites with capacity for 443 units: just 84 completions (19%)
- 2003 Midlothian Local Plan sites with capacity for 4,674 units: just 1,710 completions (37%)

- 2003 Shawfair Local Plan sites with capacity for 3,990 units: zero completions (0%)
- 2008 Midlothian Local Plan sites with capacity for 2,403 units: just 35 completions (1.5%)

Overall, committed sites, allocated from pre-2003 to 2008 with capacity for 11,510 units have delivered just 1,829 completions (15%) or c.150 units per annum average since 2003.

Whilst the proposed development at Whitehill is small-scale, the site provides a short term, deliverable opportunity to contribute high quality new housing and location choice.

Requirement for New Development

SESplan housing land requirements for the periods 2009-19 and 2019-24, extending to 8,080 units and 4,410 units respectively, require to be addressed via the Midlothian LDP.

It is noted that, based on 2012 baseline data, allowing for committed housing supply, windfall sites and contributions from constrained supply, SESplan identifies a net requirement of 2,550 units to be met by LDP housing sites. This is split into 450 units at Shawfair, 1,350 units within the A7/A68/Borders Rail Corridor and 750 units within the A701 Corridor.

Table 2.4 of the LDP states that the LDP identifies land for 830 units (Shawfair), 1,640 units (A7/A68/Borders Rail Corridor) and 1,290 units (A701

Corridor) with a further 420, 775 and 200 units safeguarded in these respective locations. Finally, land for up to 600 units is identified as ‘additional housing opportunities’ on rural/redevelopment sites which have potential constraints.

Therefore, theoretically, Midlothian Council have identified land in excess of SESplan Supplementary Guidance Table 3.2 (additional allowances), i.e. the Proposed LDP provides for 3,760 units pre-2024 (plus ‘safeguarded’ and ‘additional’ sites) with Supplementary Guidance requiring an additional 2,550 units.

However, whilst indicative programming is set out within the LDP Action Programme, the Proposed LDP does not define programmed completions into pre-2019 and 2019-24 periods, as required by SPP and SESplan (or provide for a 10%-20% generosity allowance as per SPP).

The LDP Action Programme projected programming for LDP housing sites provides for 145 No. completions on 8 No. sites in 2015/16 (i.e. the current year). However, the majority of these sites have not yet been progressed through planning or are at early stage (i.e. Cauldcoats PPiP application currently still to be determined) so delivery timescales are overly optimistic.

The Action Programme site programming would potentially allow for 1,085 completions by 2019 and a further 2,195 completions between 2019-24. As Homes For Scotland have outlined in a representation on behalf of the housebuilding industry, when applying the 2014 Housing Land Audit position with regard to land supply (and including a 10% generosity allowance) and adding the LDP site programming, there is still a shortfall of c.900 units

in the period to 2019. Whilst a proportion of this shortfall is recovered in the 2019-24 period, there remains an overall shortfall of c.250 units for the overall period to 2024.

Revised Housing Land Assessment

If a more realistic approach to LDP site programming is adopted, based on the fact the LDP is not expected to be adopted by Midlothian Council until mid-2016 (as per the Council’s Development Plan Scheme No.7, dated March 2015), new LDP sites are unlikely to achieve planning consents until late 2016/early 2017 at the earliest. Therefore, it is considered that, at best, new sites could only contribute from 2017/18 onwards which would therefore allow for just two years contribution to the 2009-19 SESplan period.

The SESplan 2009-19 requirement for Midlothian is 8,080 units (plus 10% generosity allowance is 8,888 units) and there have been 2,443 completions up to 2014 (as per Housing Land Audits 2010-2014 and the SESplan Housing Technical Note) resulting in a ‘net’ requirement of 6,445 units between 2014-19.

The 2014 Housing Land Audit sets out an effective housing land supply of 4,351 units and if adding 120 unit windfall allowance, there remains a **net shortfall of 1,974 units in the period to 2019.**

As such, the current pre-2019 (and 5 Year Effective Land Supply) shortfall of 1,974 units requires to be met from just 2 years of LDP site completions.

Figure 3 outlines estimated programming of LDP housing sites taking into account realistic phasing of sites forming additions to committed sites, the 2014 Housing Land Audit as well as rolling forward

LDP Part 2 - The Strategy for Sustainable Growth

projected programming for committed sites.

Based upon the Homes For Scotland standard completion rate (24 units per annum by one developer or 48 units per annum on larger sites with two developers), **Figure 3 highlights that less than 500 units (476) could be delivered from Proposed LDP sites by 2019 - this would result in a shortfall of just under 1,500 units.**

The reliance on a number of large-scale sites is also of concern, i.e. Shawfair (665 units 2014-19) and Redheugh (no developer yet 150 units programmed 2014-19).

Figure 3 also indicates that an estimated 1,800 units could potentially be delivered from Proposed LDP sites in the 2019-24 period. Adding a projected 2,700 units from existing committed supply within this period results in a total estimated supply of 4,500 units in the 2019-24 period. This is set against a requirement for 4,851 units in this period (4,410 + 10%) and therefore a **shortfall of c.300 units for 2019-24.**

The **overall supply to 2024 would therefore remain deficient by approximately 1,800 units** (1,500 in pre-2019 period and 300 in 2019-24 period).

Therefore, **based upon a realistic assessment of Proposed LDP site programming, there would remain a substantial shortfall within both the pre-2019 SESplan period and the overall SESplan period to 2024.**

Strategy for Development

The LDP spatial strategy is generally supported but additional, deliverable sites are required within identified Strategic Development Areas.

Midlothian Council Housing Land Assessment June 2015

South East Edinburgh (Shawfair SDA)												
Site	Units <2024	SESplan SDA Requirement	2017/18	2018/19	Pre 19 Total	2019/20	2020/21	2021/22	2022/23	2023/24	2019-24 Total	2017-24 Total
Hs0 Cauldcoats	350		24	24	48	48	48	48	48	48	240	288
Hs1 Newton Farm	480		0	24	24	48	48	48	48	48	240	264
Total	830	450	24	48	72	96	96	96	96	96	480	552
A7 / A86 Borders Rail SDA												
Hs2 Larkfield West, Eskbank	60		24	24	48	12	0	0	0	0	12	60
Hs3 Larkfield South West, Eskbank	30-40		24	16	40	0	0	0	0	0	0	40
Hs4 Thornybank East, Dalkeith	65		24	24	48	17	0	0	0	0	17	65
Hs5 Thornybank North, Dalkeith	30		24	6	30	0	0	0	0	0	0	30
Hs7 Redheugh West (Phase 2), Gorebridge	200		0	0	0	0	0	0	0	0	0	0
Hs8 Stobhill Road, Gorebridge	80		24	24	48	24	8	0	0	0	32	80
Hs9 Broomieknowe, Bonnyrigg	55		24	24	48	7	0	0	0	0	7	55
Hs10 Dalhousie Mains, Bonnyrigg	300		0	24	24	48	48	48	48	48	240	264
Hs11 Dalhousie South, Bonnyrigg	360		0	0	0	0	0	0	24	24	48	48
Hs12 Hopefield Farm 2, Bonnyrigg	375		0	0	0	24	24	24	24	24	120	120
Hs13 Polton Street, Bonnyrigg	12-15		15	0	15	0	0	0	0	0	0	15
Hs14 Rosewell North	60		0	0	0	24	24	12	0	0	60	60
Total	1627-1640	1350	159	142	301	156	104	84	96	96	536	837
A701 Corridor SDA												
Hs15 Edgefield Road, Loanhead	25		25	0	25	0	0	0	0	0	0	25
Hs16 Seafield Road, Bilston	350		0	0	0	24	24	24	24	24	120	120
Hs17 Pentland Plants, by Bilston	75		0	24	24	24	24	3	0	0	51	75
Hs18 Roslin Institute, Roslin	200		0	24	24	24	24	24	24	24	120	144
Hs19 Roslin Expansion	260		0	0	0	0	24	24	24	24	96	96
Hs20 Auchendinny	350		0	0	0	24	24	24	24	24	120	120
Hs21 Eastfield Farm Road, Penicuik	10		10	0	10	0	0	0	0	0	0	10
Hs22 Kirkhill Road, Penicuik	20		20	0	20	0	0	0	0	0	0	20
Total	1290	750	55	48	103	96	120	99	96	96	507	610
Constrained Sites												
AHs1 Rosslynlee, by Rosewell	120-300		0	0	0	0	0	24	24	24	72	72
AHs2 Burghlee, Loanhead	175		0	0	0	0	0	24	24	24	72	72
AHs3 Belwood Crescent, Penicuik	25		0	0	0	25	0	0	0	0	25	25
AHs4 Pomathorn Mill, Penicuik	50		0	0	0	25	25	0	0	0	50	50
AHs5 Wellington School	50-60		0	0	0	24	24	12	0	0	60	60
Total	420-610		0	0	0	74	49	60	48	48	279	279
Total PLDP Allocations												
	4167-4370	2550										
PLDP Sites			238	238	476	422	369	339	336	336	1802	2278
Housing Land Audit Sites			994	941	1935	822	571	519	426	370	2708	4643
Combined Total of HLA & PLDP Sites			1232	1179	2411	1244	940	858	762	706	4510	6921

Note: Assume site completions from 2017/18 onward, post LDP approval – programming estimated as per Homes For Scotland accepted 24pa for 1 developer
Note: Housing Land Audit Sites – 2021/22 onwards estimated roll-forward from 2014 HLA

Figure 3 - Projected Housing Land Assessment

Accommodating Growth in Our Communities

It is noted that Policy DEVI seeks to mitigate impact upon community identity derived through settlement coalescence.

As noted above, this process has emerged over the last two to three development plan cycles in Midlothian and is generally unavoidable to a certain extent if the area is to remain a focus of growth as per the Strategic Development Plan.

The policy is generally supported in terms of the requirement for mitigation measures including community woodland and landscape buffer zones.

The proposed small-scale completion of the streetscape at Whitehill would constitute proportional growth within an accessible local village.

Providing for Housing Choice

The Council’s move towards a general 25% ratio for affordable housing, as per Policy DEV3, is generally supported.

However, it is noted that the proposed site would be below the 15 unit minimum threshold for affordable housing and therefore would not require to accommodate this policy.

The proposal would provide high quality detached homes in an accessible location and therefore add to housing choice in Midlothian.

Quality of Place

The Council’s emphasis on sustainable development and high quality placemaking (including landscaping and open space) as outlined within Policies DEV5, DEV6, DEV7 and DEV9 is generally supported.

The village of Whitehill, whilst remaining separate from the main urban area and rural in nature is located in close proximity to the expanding urban area at Dalkeith with a footpath connection from the village to the A6106 and onwards through the Wester Cowden housing to the proposed new neighbourhood centre and the established Dalkeith Schools Campus (the catchment primary and secondary schools for Whitehill).

The village of Whitehill developed in a linear form along the main road, with the exception of two areas set-back from the road (‘Witholm’ to the southwest and The Square to the north) which have been redeveloped into modern detached housing estates. The village has therefore altered in form and provides the basis for further extension which can reflect the traditional linear pattern along the main road. Development along the south of the main road would mirror that to the north, in terms of scale, and allow for a ‘completion’ of the village whilst retaining its semi-rural character.

Figure 4 provides an indicative design framework for the proposed site at Whitehill, highlighting the proposed low-density approach.

Whitehill, Midlothian - Indicative Design Framework



- 1 Street frontage plots with landscaped set-back and shared surface access lanes, allowing for 12 No. detached plots
- 2 Plots arranged in series of three blocks of 4, phased to allow for 10% village growth over 3 years
- 3 New village park created adjacent to mature trees and village centre
- 4 Bus stop shelter linked to kerb build-out, street crossing and new footpath on southern roadside
- 5 Woodland planting forming shelter belt
- 6 Existing stone wall and tree boundary frontage retained forming mature, semi-rural setting

Figure 4 - Whitehill: Indicative Design Framework

Developer Contributions

Implementation of the Council's strategy is noted under the provisions of Policies IMPI-5 in relation to new development requirements, key essential infrastructure, water and drainage, health centres and emergency services.

With regard to the proposed site at Whitehill, the need for contributions to necessary and proportionate infrastructure upgrading is acknowledged.

The landowners will work with Midlothian Council to determine the necessary requirements to implement land at Whitehill.

Settlement Statement

There is no settlement statement for Whitehill within the Proposed LDP. **Figure 5** outlines an indicative settlement map illustrating the proposed site within the context of Whitehill and the immediate locality.

Whitehill has experienced housing growth through redevelopment of sites at western and eastern edges and the proposal would complete the village form.

Infrastructure and Community Facilities

As illustrated on Figure 2 (Page 4), the site is accessible to local services and amenities including education at Dalkeith Schools campus. Contributions to necessary local upgrades could be agreed with the Council.

Environment

The proposal includes new woodland planting along the south-western edge and potential for a new village park to provide a central focus and amenity for Whitehill. The woodland offers scope to create a woodland walk around the edge of the proposed site and enhance access to the countryside.

Key Issues & Objectives

The proposed site would be of a low density scale appropriate to Whitehill and site design and landscaping would allow for views to be maintained through the site to the south-west. The proposal would provide additional housing choice and enhanced amenity for the village through the aforementioned greenspace proposals.

Proposed Site Brief

An objection is raised on the basis of non-inclusion of Whitehill Site VR8 as a housing allocation. Whitehill Site VR8 should be included within the Proposed LDP on the following basis:

- Scope for approximately 12 house plots
- Scope for reflecting set-back frontage development to main street with new village park/play area
- Structural landscaping required on southern boundary to form new village edge with scope for woodland walk
- Access to be taken via, at most, 2 points from main street
- Existing stone wall and trees on main street boundary to be retained with exception of access
- New footpath to be formed on southern side of main street

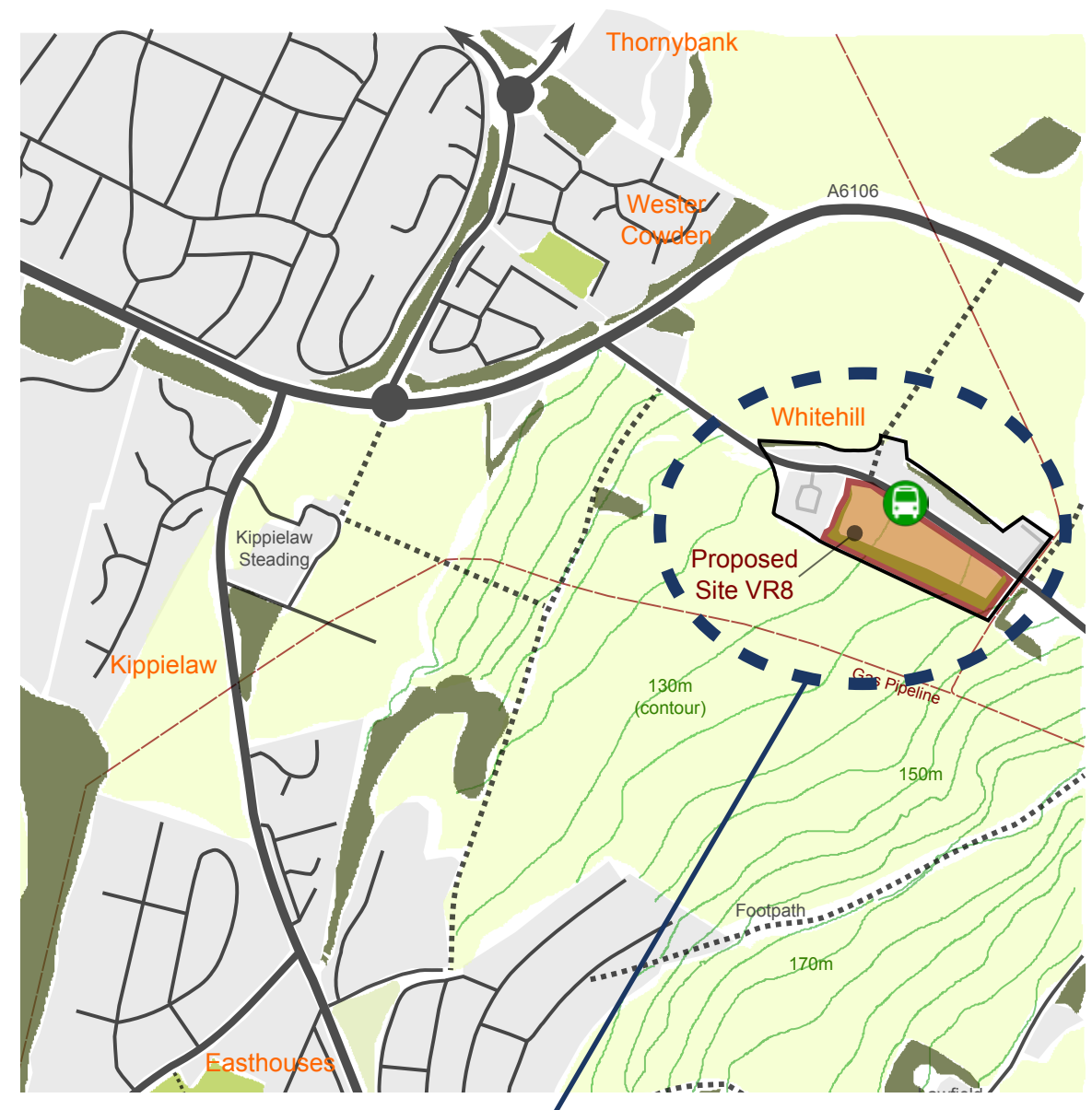


Figure 5 - Proposed Whitehill Settlement Statement Map.

Appendix 2 - Assessment of Development Sites

In a previous representation to the LDP Main Issues Report in August 2013, an assessment of preferred and alternative housing sites was undertaken in terms of the Council's environmental assessment criteria.

This indicated that there were 13 key issues utilised to assess sites covering aspects including accessibility, biodiversity, energy efficiency, cultural heritage, greenbelt, landscape, coalescence, brownfield use, peatland, prime agricultural land, watercourse impact and flooding.

Of the 13 preferred sites, the average positive assessment was 9/13 based on the above criteria. Of the 4 alternative sites, the average assessment was 8/13 based on these criteria. Whitehill Site VR8 was also rated positively for 8/13 criteria by the Council with mitigation measures capable of addressing any perceived deficiencies (as with other preferred sites).

Site VR8 therefore compares favourably as a preferred housing site in terms of the Council's own environmental assessment in advance of the publication of the Proposed LDP.

In terms of the Proposed LDP Environmental Report, the same key criteria-based assessment has been provided by the Council in support of proposed housing sites.

In this respect, this comparative assessment between preferred/proposed sites and Whitehill Site VR8 is reproduced on this page and Page 10 for reference.

LDP MIR Criteria Assessment

The **LDP MIR Development Sites Assessment** appraised proposed development sites nominated as part of the 'call for sites' exercise in early 2012, based on **13 No. issues** comprising the following:-

- *Accessibility 1* (Jobs/Services) – including schools, health centres and retail facilities being within walking distance of sites, utilising PAN75 threshold of 1600m
- *Accessibility 2* (Existing/proposed public transport) – walkable connections (400m for bus service access and 800m for proposed rail stations) with service frequency considered (3 per hour a positive)
- *Bio-diversity* (areas designated for the protection of habitats or with potential as a habitat resource)
- *Energy Efficiency* (related to elevation of site and potential for increased energy use with a guide of 215m utilised with sites over this level assessed negatively)
- *Cultural Heritage* (assessment of whether proposed development would have a negative, neutral or positive impact upon historical feature or setting (listed buildings, conservation areas, designed gardens and landscapes, archaeological features)
- *Green Belt* (assessment of impact on designated areas)
- *Landscape* (assessment of impact with proposed sites within Areas of Great Landscape Value, or equivalent, rated negatively and sites adjoining such designations assessed for impact plus requirement to avoid 'conspicuous' locations requiring extensive landscape treatment with assessment of existing woodland, landform, topography, views, skylining, landscape capacity, existing and proposed green networks and impact on public open space)
- *Coalescence* (assessment of impact of filling gap sites between settlements which would detract from individual settlement character, with sites assessed negatively where risk was greatest)
- *Brownfield/Greenfield* (negative assessment for greenfield sites)
- *Peatland* (negative assessment if within areas of known resource)
- *Prime Agricultural Land* (negative assessment if proposed site comprised Class 1, 2 or 3.1 land)
- *RBMP* (impact of sites on local watercourses in line with SEPA's River Basin Management Plan)
- *Flooding* (assessment of flood risk in conjunction with SEPA advice)

MIR Housing Sites

Based on the above criteria, the 'preferred' and 'alternative' housing sites and their respective rating can be summarised as per the following:-

'Preferred Sites'

S2 – Newton Farm, Shawfair (6/13, negatives for public transport accessibility, cultural heritage impact, Green Belt, landscape, prime agricultural land, greenfield)

G1 – Redheugh West (10/13, negatives for public transport accessibility, greenfield and prime land)

G9 – Greenhall Centre (12/13, negative for landscape)

BG1 – Broomieknowe, Bonnyrigg (10/13, negatives for Green Belt, coalescence, greenfield and prime land)

BG2 – Dalhousie Mains, Bonnyrigg (7/13, negatives for Green Belt, landscape, coalescence, prime land, greenfield with flood risk assessment required)

BG3 – Dalhousie South, Bonnyrigg (8/13, negatives for accessibility to public transport, cultural heritage including archaeology, landscape, greenfield and prime land)

D8 – Larkfield West, Eskbank (8/13, negatives for accessibility to public transport, cultural heritage including archaeology, Green Belt, greenfield and prime land)

E1 – Kippielaw, Easthouses (10/13, negatives for coalescence, greenfield and prime land)

R1 – Rosewell North (10/13, negatives for cultural heritage including archaeology, greenfield and prime land)

R3/R5 – Thornton Road N& S, Rosewell (11/13, negatives for greenfield and prime land)

BN1 – Seaford Road 2, Bilston (7/13, negatives for Green Belt, greenfield, prime land with concerns relating to landscape, impact on watercourses and flood risk)

RN3/RN6 – Roslin Expansion, Roslin (9/13, negatives for Green Belt, greenfield, prime land with concerns relating to landscape, development scale and cultural heritage)

RN5 – Roslin Institute, Roslin (10/13, negatives for Green Belt and prime land with concern over cultural heritage impact)

Preferred Sites Summary:

- **Of the 13 No. 'preferred' sites, the average assessment is 9/13**
- **All but one rated negatively for prime agricultural land**
- **All but 2 rated negatively for greenfield land**
- **5 sites are rated negatively for cultural heritage/archaeology**
- **4 sites are rated negatively for landscape**
- **4 sites are rated negatively for accessibility**

'Alternative Sites'

S1 – Cauldcoats Farm, Shawfair (4/13, negatives for majority of criteria including landscape, flood risk, archaeology, coalescence, Green Belt, greenfield, prime agricultural land and accessibility)

BG5 – Hopefield 2, Bonnyrigg (9/13, negatives for cultural heritage including archaeology, greenfield and prime land with SEPA concern re flood risk)

G5 – Stobs Farm 2, Gorebridge (10/13, negatives for landscape, greenfield, prime land)

A1a – Auchendinny (8/13, negatives for accessibility, greenfield, prime land plus landscape concerns)

Alternative Sites Summary:

- **Of the 4 No. 'alternative' sites, the average assessment is 8/13**
- **All sites rated negatively for greenfield land and prime agricultural land**
- **2 sites are rated negatively for cultural heritage/archaeology**
- **2 sites are rated negatively for landscape**
- **2 sites are rated negatively for accessibility**

The summary of the Council's assessment demonstrates that in order to identify housing opportunities, both greenfield sites and prime agricultural land will require to be utilised. **Almost half of all preferred or alternative sites have some level of assessed impact on landscape and cultural heritage designations including archaeology along with concerns relating to accessibility.**

Therefore, the Council will require to take into account potential mitigation measures

with regard to these factors in order to deliver the required level of housing land.

With regard to **Proposed Site E2 (Easthouses/Mayfield)**, the site is **rated positively for 9 / 13 criteria (equating to average 'preferred' site assessment)** with negative assessments for Cultural Heritage (archaeology only), Landscape, Greenfield and Prime Agricultural Land. The proposed approach to mitigating both landscape and impact on archaeological remains is outlined above and is considered to provide a robust approach to placemaking and housing provision.

With regard to **Proposed Site VR8 (Whitehill)**, the site is **rated positively for 8 / 13 criteria** with negative assessments for accessibility (both public transport and proximity to services), landscape, greenfield land and prime land. Mitigation measures and factors relating to accessibility and landscape are also outlined above.

In terms of **accessibility**, it is worth considering the **Council's own assessment of preferred sites** within the A7/A68 corridor contained within Appendix 3 of the MIR's Development Site Assessment which outlines measured distances to the key services of schools (primary), health and retail facilities.

This highlights that **3 of the preferred sites are over 2000m from the nearest primary school** (D8 – Eskbank, G1 – Redheugh and G9 – Greenhall Centre), being well over the 1600m 'walkable' threshold. All but one site (E1 – Kippielaw) are over 2000m from secondary schools. The proposed Whitehill site is within 1950m of the Dalkeith Schools Campus, which offers both Primary and Secondary schooling.

In terms of **retail**, **3 sites are 4km-5km from facilities** (Rosewell) with 2 sites over 1600m (BG3 - Dalhousie South & E1 Kippielaw). Whitehill by comparison is within 1600m of planned local and service facilities including a neighbourhood centre and foodstore.

Finally, with regard to local **healthcare**, **3 sites are 4km-5km from nearest facility** (Rosewell) and 3 sites are over 1600m (Sites BG3 - Bonnyrigg, D8 - Eskbank & E1 - Kippielaw). Whitehill is 2.5km from Dalkeith Health Centre, accessible with an hourly bus service with bus stop adjacent to the proposed site, thereby providing a convenient and direct public transport link.

Accessibility

In terms of accessibility, it is noted that the Council's accessibility assessment contained within the LDP Technical Note – Development Sites Assessment, rates the site negatively with respect to distance to services and public transport.

To reiterate, Whitehill is in close proximity to the main Dalkeith urban area and its associated services. In particular, as part of Dalkeith's north-eastern expansion at Thornybank/Wester Cowden, there is a **planned neighbourhood centre** (south of schools campus) and a **recently completed Sainsbury's store at Thornybank** (as part of wider Mactaggart & Mickel development) both within 1600m of the centre of the village. **Both are within the maximum walking distance criteria set out in PAN75 (Annex B) and these services have not been considered in the Council's assessment.**

Whilst Dalkeith Schools Campus is outwith this threshold distance, it is not significantly further, being 1950m from the proposed site. Given travel to school is for a dedicated purpose (i.e. not an optional activity), there is far greater scope for people to walk or cycle such a distance (particularly given the safe nature of the majority of the route on paths and residential streets via Wester Cowden). The approximate journey time would be 20-25 minutes walk or 7-8 minutes cycle and there is scope to improve the safety of this route via possible minor improvements.

Notwithstanding local pedestrian/cyclist links, the No.51/52 Munro's bus service passes through the village with a regular hourly service providing connection to Dalkeith town centre (10 minutes) and Edinburgh city centre (40-45 minutes), thereby

providing a directly accessible option to reach wider services including health centres and more significant retail, leisure and employment and planned rail stations are within c.4.5km, offering a 15 minute cycle to connect to regular rail services to Edinburgh city centre.

An **Access Appraisal** was undertaken by **Modus Transport Solutions** as part of the representation to the LDP Main Issues Report. The report findings are summarised below:

Background

- Development of the site at Whitehill provides residential development which **accords with the criteria set out within SPP while at the same time providing a "life style choice" of semi-rural living.** Midlothian Council and the Scottish Government recognise that current **smarter working practices** allow people to contribute to the economy of Scotland through home working which in turn changes their travel patterns and reduces their overall need to travel. This in turn reduces their carbon footprint and impact upon the environment.
- The Whitehill development ensures that appropriate connections are provided to the surrounding pedestrian and cycle networks. Bus stops lie directly adjacent to the site on the main road through the village. This provide residents of Whitehill a **choice of travel mode in line with those available to residents in larger towns within Midlothian.** Given the size and nature of the development there will be **no detrimental effect on the capacity of the road network.** A residential Travel Plan

will be prepared at the forthcoming planning application stage to encourage sustainable travel practice. The site layout will be further developed in line with the principles of Designing Streets.

Proposed Design & Street Character

- The indicative design framework prepared by Clarendon Planning & Development addresses the location of the site in the context of the surrounding village and sets out the development proposals and sets out the potential access arrangements for the development which embrace and reflect the key design principles contained within the Scottish Government's publication 'Designing Streets'. **Either one or two shared surface access points will serve the development from the main road with the development in turn having direct street frontage.** This direct street frontage which will **create an enhanced village "feel" through the creation of a "two-side" village core. This two sided village core will have the added advantage of emphasising the 30mph speed limit which currently exists through the village. At present the typically one sided nature of the village, i.e. all the properties on one side only, reduces driver awareness of the 30mph limit.** The introduction of development on both sides of the road will without doubt make drivers more aware of their environment and almost certainly slow traffic. This will in turn **improve the overall "feel" of the village for residents and visitors.**

Homeworking Flexibility

- The size and more importantly the location of the Whitehill development plays a significant part in the overall access strategy for the proposed development. Unlike more traditional larger scale residential developments in towns and cities the residents of Whitehill have chosen to stay in such a location in order to experience a semi-rural life style. This in turn brings with it a different mind-set in respect of travel mode choice. While Midlothian Council's Transport Strategy seeks to ensure that the Council is allocating land for development that accords with national policy and guidance, this needs to be taken in the context of **providing an overall offer of development which meets the needs of all residents in Midlothian.** The Scottish Government recognises in its document Low Carbon Scotland: Meeting the Emissions Reduction Targets 2010 – 2022 the potential to encourage **flexible and home working** opportunities which will in turn help to **reduce Scotland's overall carbon emissions.**
- Midlothian Council have set out in their own Transport Strategy the requirement to encourage Midlothian Council staff to change the way in which they travel to / from work, travel during work and indeed the location of where they work. **Midlothian Council accept, and indeed are encouraging, their own staff to become home workers where appropriate and to use technology such as tele-conferencing and video-conferencing.** It is therefore not unreasonable to suggest that **people who chose to stay in villages such as Whitehill may in fact do so because**

they are flexible or home workers and do not need to travel on a normal commute to work.

Walking

- National transport planning guidance recognises the need for locating new development in close proximity to trip attractors including employment, education and retail. To encourage shorter journeys on foot, it defines a distance of **1.6km (20 minute walk) as a threshold for walking trips** between new developments and trip attractors. Obviously given the semi-rural nature of the Whitehill Village development site there is a need to allow for a level of flexibility in relation to walking distances, however in general the 1.6km threshold has been considered within this assessment.
- A **high quality footway is already provided along the northern side of the main road** through the village with a short section of footway on the southern side adjacent to Witholm. As part of the development proposals **an additional footway will be provided along the development frontage on the south side of the main road**. This additional footway on the south side will **enhance the overall pedestrian environment within the village and assist with informing drivers of the 30mph speed limit**. The footway on the northern side of the main road continues to the eastern boundary of Dalkeith and the Thornybank residential area. Footway links are then provided through the Thornybank area to various facilities such as schools, centre of employment and local shops (including the new Sainsbury's store at Thornybank). These new facilities, and indeed the Dalkeith School Campus, all lie just over the PAN 75 threshold of a 20minute or 1600m walk at around 1750m

or a 22minute walk.

Cycling

- Although there are no on street cycle facilities through the village of Whitehill, the **low volume of traffic on the main road allows for easy and safe on street cycling towards Dalkeith**. Once at the Thornybank residential area there are a number of off street cycle facilities and links to both the Local and National Cycle Networks. **National Cycle Route 1 is easily accessible from Whitehill** and provides high quality access directly into Edinburgh and beyond.
- Local cycle networks include the **Pencaitland railway path**, NCR 196, which can also easily be reached from Whitehill and this provides a **high quality link to Haddington**. Other cycle links are provided into Dalkeith Town centre as well as towards Mayfield.

Public Transport

- There are **two bus stops directly adjacent to the site on the main road through Whitehill**. These stops are provided with a bus pole and flag and timetable information. As part of the development proposals the **existing bus stops and flags could be upgraded to have new bus shelters**.
- First Scotland East operate **two services along this route**, Service 51 and 52, which run from Jedburgh to Edinburgh City Centre. The route passes through Dalkeith, Little France, Newington and then arrives in Edinburgh City Centre. These services run alternately **ever hour from 7am until 7pm**. Alternatively, **additional services can be obtain on Cowden Road at Dalkeith Heights a 1100m walk** from the site.

- Bus facilities are however provided within 400m of the proposed development** and it is only the 1 hour service provision which does not meet with Midlothian Council criteria. Residents of Whitehill do however have a bus facility which provides a **real alternative to the private car for recreational and commuter journeys into Edinburgh with a journey time of only 33 minutes**.

Site Access & Internal Layout

- Vehicle access is proposed via two shared surface access points off the main road running through the village. From these shared surface access points an access lane will be provided to service the 12 properties which are proposed. **The access points to the development will also provide the potential to introduce traffic calming measures in the village** which can take the form of either horizontal deflection with kerb build outs or vertical deflection through the introduction of raised tables. These in turn can be linked with the proposed new bus shelters to improve the overall pedestrian amenity within the village and assist in maintaining traffic speeds to an appropriate level.
- Visibility splays from the proposed shared surface access points will be designed to provide appropriate visibility, namely 4.5m x 90m. Internally **the site will be designed in line with Designing Streets** and a new footways will be provided along the frontage of the site to improve overall pedestrian amenity and accessibility.

Vehicle Trip Generation Estimates

- To determine the potential impacts of the development on the surrounding road

network, vehicle trip generation estimates were determined for the 12 units proposed. To determine vehicle trip generation estimates, the TRICS database was interrogated for similar sized residential developments in semi-rural areas with similar public transport connections for the weekday morning and evening peak hours.

Table 1: Vehicle trip generation estimates					
	Morning peak		Evening peak		
		Arrivals	Departure s	Arrivals	Departure s
Trip rate (per dwelling)	0.1		0.65	0.55	0.1
Trip generation estimates 12 Units	1		8	6	1

- It is considered that predicted development related vehicle trips of will have no impact on the operation of the surrounding road network in the weekday morning and evening peaks.

Summary

- The report demonstrates that the development of the site at Whitehill supports the transport objectives of the emerging Midlothian Local Development Plan and the Midlothian Local Transport Strategy. In addition the development proposals cater for a demand for a semi-rural life style which provides real travel choices for its residents be it for travel to work, retail or leisure.

Site Effectiveness Summary

PAN2/2010 criteria for assessing site effectiveness provide a test against which sites require to be gauged with land at Whitehill considered effective, being free of potential site constraints and able to deliver units within the plan period.

Specifically:-

Ownership

Effective - the site is owned by a willing seller and subject to expressions of interest from housebuilders.

Physical

Effective - preliminary investigations have identified areas of mining activity but at shallow depth and outwith the proposed development areas and there is no flood risk.

Contamination

Effective - the site, given its greenfield nature, has been deemed to have a low risk of contamination, which is supported by preliminary investigations and will be confirmed via Stage 2 intrusive investigations in due course.

Deficit Funding

Effective - The development will be privately funded, also allowing for required infrastructure upgrades.

Marketability

Effective - The wider Edinburgh housing market remains a highly marketable location with demand for both private and affordable units confirmed via the SESplan Housing Needs and Demand Assessment. The site can be completed within the LDP timescale.

Infrastructure

Effective - preliminary investigations indicate utility connections and water and drainage connections are available with localised upgrading of capacity able to be met by the developer.

Land Use

Effective - Housing is the predominant proposed use for the site.

Overall

Preliminary investigations indicate that there are **no known constraints which will hinder delivery of housing completions** within the LDP period and indicative designs provide scope for a high quality residential extension at Whitehill.

- **The Council’s vision and aims in terms of supporting growth within Midlothian and identified strategic development areas is generally supported**
- **Notwithstanding allocation of housing sites within the Proposed LDP, Midlothian will not achieve SESplan housing requirements to 2019 nor will provide a 5 year effective housing land supply with an overall estimated deficit to 2024**
- **Lawfield Estate therefore object to the non-inclusion of land at Whitehill Site VR8 as a proposed housing allocation within the Proposed LDP**
- **Whitehill Site VR8 forms an opportunity to complete the village and create double-frontage development to the main road with associated natural traffic calming and village character benefits**
- **The site can be planned and designed to provide a high quality, small-scale residential environment with scope for approximately 12 No. detached plots set within a landscape framework including a woodland walkway and village park / play area**
- **The landowner is keen to work with Midlothian Council to agree necessary and proportionate infrastructure requirement to allow for implementation of the site**
- **Whitehill Site VR8 compares favourably with proposed housing sites in terms**

of the Council’s own environmental assessment criteria, as illustrated within the response to the LDP MIR and there is no justification to not include the site as a proposed housing site at this stage

- **Whitehill, whilst a village, is very accessible to surrounding amenities and services and an Access Appraisal undertaken by Modus Transport Solutions demonstrates how the proposed development can also be supported as a home-working housing choice to contribute to the range of housing offered within Midlothian**

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