

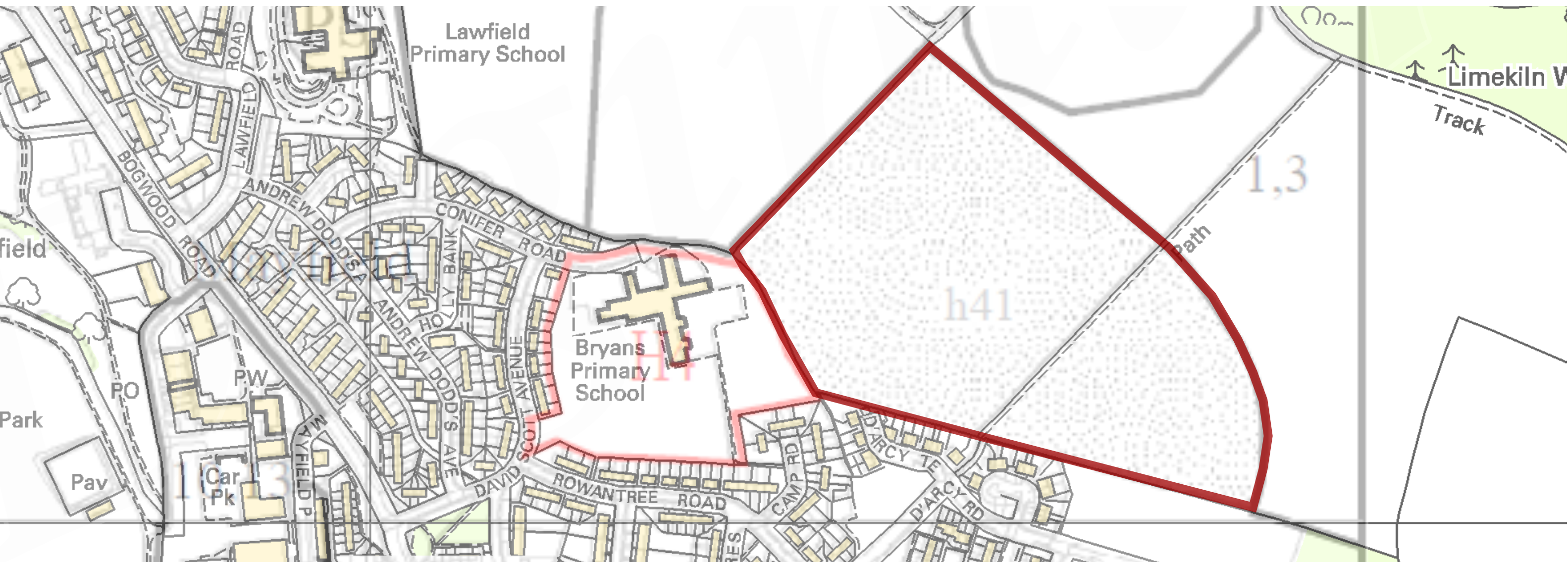
# Representation to Proposed Midlothian Local Development Plan

In Support of  
Allocated Site h41, North Mayfield, Midlothian

Prepared by  
Clarendon Planning and Development Ltd

On behalf of  
Barratt Homes

June 2015



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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 Barratt Homes and follows previous representations to the Council's LDP Main Issues Report in August 2013 on behalf of the landowner.

The representation **supports the inclusion of land for residential development at North Mayfield Site h41 but seeks an amendment to the indicative site capacity referenced within the Proposed LDP.**

This submission briefly reiterates the site's deliverability and potential to make a significant contribution to Midlothian's identified housing land supply shortfall.

## Proposal Background

The site extends to approximately 8 hectares and is currently agricultural land with a west/south-west aspect. The site, as highlighted on the accompanying plan, is bound to the south by Council-owned land and Oak Place (with established housing beyond), to the south-west by a Allocated housing Site h48 (the Council-owned former Bryans Primary School site) and to the north-west, north and east by further agricultural land.

The continued allocation of Site h41 is fully endorsed and this representation elaborates upon the site's effectiveness and deliverability as endorsed by live planning permission now underway.

In terms of planning history, Site h41 was allocated in the 2003 Midlothian Local Plan and retained as a housing site in the 2008 adopted Local Plan with a notional capacity for 63 units (albeit this was not based on a detailed appraisal and layout of the site) with the need for a 30m tree belt to the rural edge.

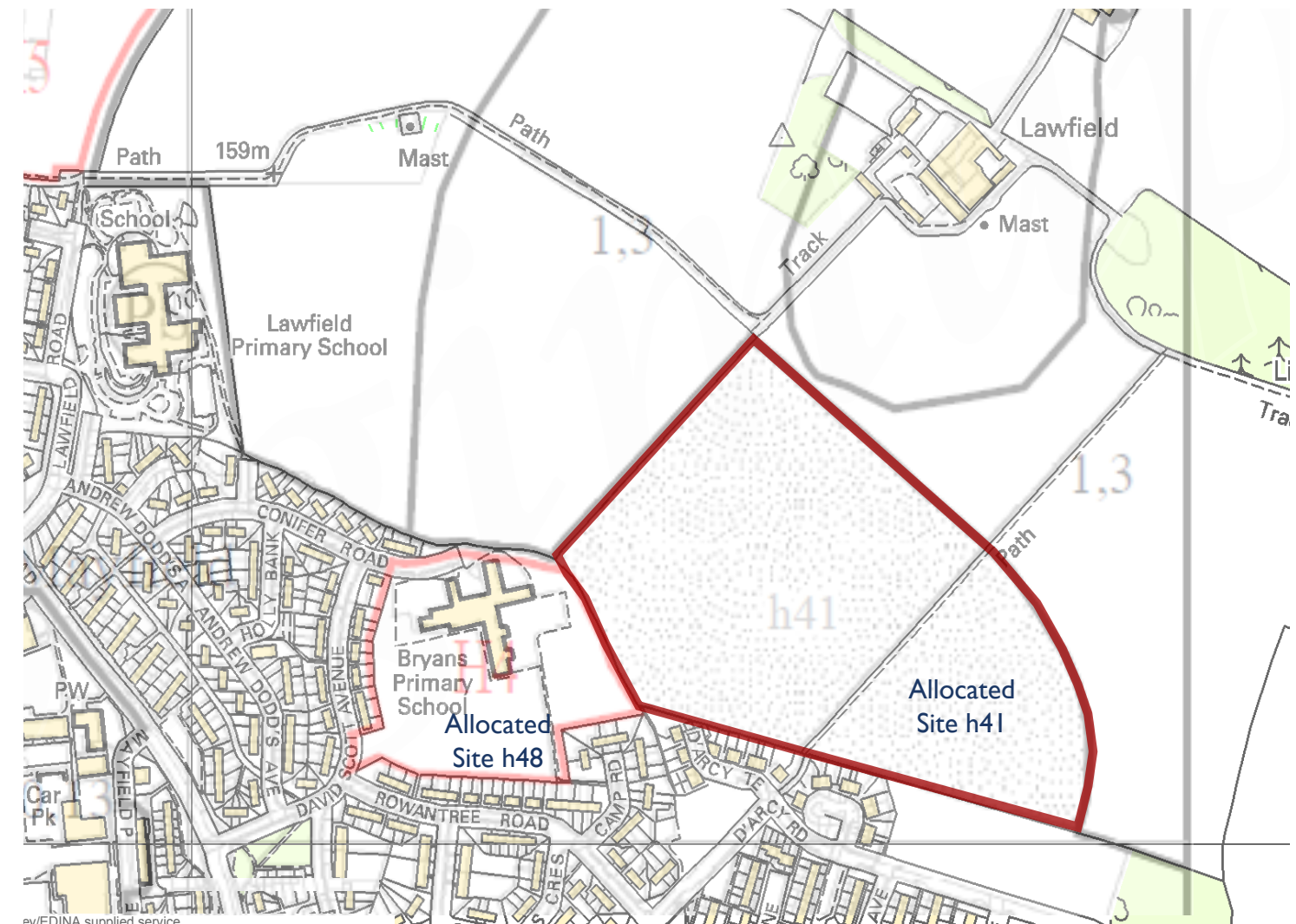


Figure 1 - Location Plan for Allocated Site h41 - North Mayfield



## 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 housing will be located close to good community facilities, shops and employment opportunities, with efficient and high quality public transport connections” and objectives include ensuring the, “established community will benefit as much as possible from growth, through new affordable homes, enhanced employment prospects, improved facilities and the development of green networks with opportunities for leisure and recreation”.

**Maximising the development scope of allocated sites such as Mayfield can clearly assist in delivering the Council’s Vision Statement.**

## 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 numbers as both the 5 year effective land supply and SESplan targets will not be achieved.**

In terms of the LDP’s environmental objectives, maximising the scope of the allocated site at Mayfield 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**, the site is well located in terms of 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”.

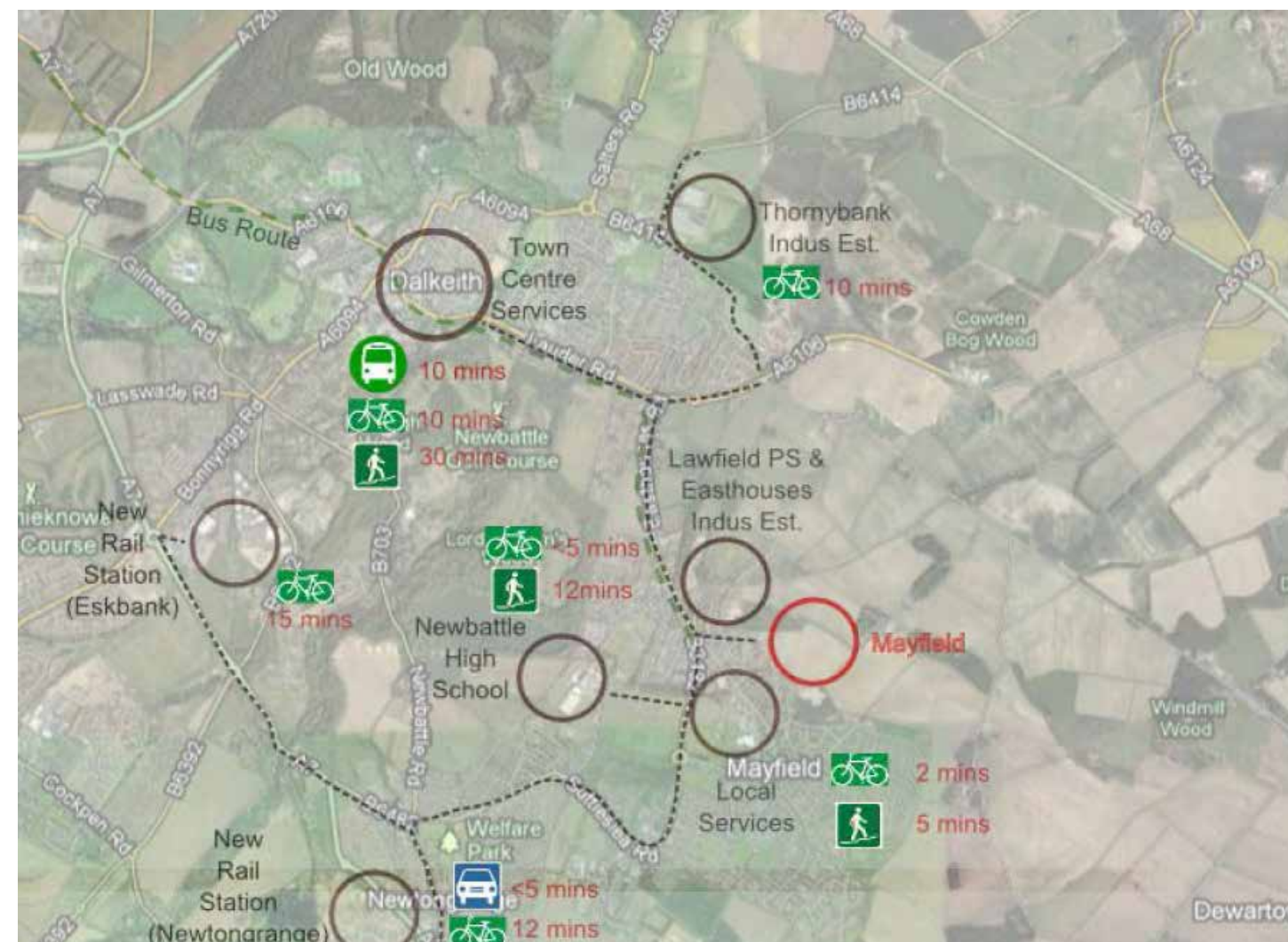


Figure 2 - Mayfield Connectivity

## 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 (SPP) 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.

Further joint working between landowners and Midlothian Council is required if stalled committed sites are to be unlocked and delivered.

## 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% 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 2,444 completions up to 2014 (as per Housing Land Audits 2010-2014 and the SESplan Housing Technical Note) resulting in a ‘net’ requirement of 6,444 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 1,973 units in the period to 2019.**

As such, the current pre-2019 (and 5 Year Effective Land Supply) shortfall of 1,973 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.**

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 allocated sites within strategic development areas should be maximised in terms of site capacity.

### 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 DEV1 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.

It should be noted that increased density at Mayfield Site h41 would not have any coalescence impact and would consolidate growth on the north-eastern edge of the settlement. It is therefore one of the few areas within the A7/A68/Rail Corridor that would not present a coalescence risk.

### Providing for Housing Choice

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

However, as noted within the policy text, specific circumstances should be taken into account in terms of the availability of affordable housing within the immediate locality. This has particular relevance for Mayfield where the adjoining residential area is predominantly ex-local authority housing and further analysis would be required as part of any

planning application to determine the suitable ratio of affordable housing provision on this site.

Additionally, the broad definition of affordable housing as contained within the Council's Affordable Housing Supplementary Planning Guidance is supported as options for mid-market rent and discounted sale should form an integral element of any potential proposals for Mayfield.

### 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.

It is considered the proposed site at Mayfield can be planned and designed in a manner to meet the key design policy objective whilst providing an increased capacity than that referred to in the Proposed LDP. In this respect, the gross site area is 8 hectares and assuming a 25% deduction for open space, woodland and SUDS, a net developable area of 6 hectares (at a density of 30 units per hectare) would provide for approximately 180 units. Increased density would accord with Government guidance and best practice of encouraging increased density, with particular regard to making efficient use of greenfield sites.



Figure 4 - Mayfield Site h41: Indicative Design Framework

The landowners will work with Midlothian Council to determine the necessary requirements to implement land at Mayfield Site h4I.

The site forms part of the 2003 Local Plan allocations and it is noted from the LDP Settlement Statement for Mayfield/Easthouses that contributions towards additional capacity at Lawfield Primary School and Newbattle Community High School will be required, in addition to contributions towards denominational secondary capacity.

Additionally, it is noted that whilst Site h4I requires to contribute towards local access improvements it is not subject to contributions towards the Borders Rail Line or wider infrastructure upgrades other than Mayfield town centre improvements (which require clarification).

With regard to affordable housing, it is noted that whilst Site h4I forms a 2003 Local Plan allocation which was subject to a maximum 10% requirement, the Proposed LDP requires all sites without consent to be subject to a 25% requirement. However, as noted within the Proposed Policy DEV3, if justification can be provided as to why a provision of less than 25% is required there is scope to relax this provision.

### Background

The settlement statement for Mayfield / Easthouses notes the long-standing support for expansion of these ex-mining towns with housing allocations in 2003 and 2008 Local Plans.

Whilst a significant element of committed housing supply at Mayfield remains undeveloped, Allocated Site h4I is now being progressed through planning (and discussions with the Council with regard to access via Oak Place) and there is an opportunity to optimise the developability of this greenfield allocation.

### Infrastructure and Community Facilities

It is noted that financial contributions towards education capacity and town centre improvements will be required for Site h4I which will be addressed through the planning application process.

### Environment

Proposals for allocated Site h4I will allow for structural planting and new open space which will enhance the north-east edge of Mayfield.

### Key Issues & Objectives

Delivering an increased number of units at Site h4I will accord with LDP objectives for Mayfield

including provision of a range of housing (including affordable), provision of high quality green network and scope for sustaining Mayfield local centre retail and services through added population.

### Contribution to Settlement Strategy

Whilst the continued allocation of Mayfield Site h4I is wholly supported on the basis of live planning promotion, the LDP reference to site capacity should be amended from 63 units to approximately 180 units on the basis of the potential density achievable through efficient use of this greenfield site.

As noted above, the gross site area is 8 hectares and assuming a 25% deduction for open space, woodland and SUDS, a net developable area of 6 hectares (at a density of 30 units per hectare) would provide for approximately 180 units.



## Site Effectiveness Summary

PAN2/2010 criteria for assessing site effectiveness provide a test against which sites require to be gauged with land at Mayfield (Site h4I) 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 now under contract to a national housebuilder.

### **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. Whilst delivery of the affordable housing may require public subsidy via Registered Social Landlord housing delivery, housebuilders can also provide non-subsidised discounted sale units on-site at Mayfield.

### **Marketability**

Effective - The 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 proposed site programming (allowing for statutory approvals and construction lead-in) for the Mayfield Site h4I would be 30 units per annum (private and affordable) from 2016/17 with scope for approximately 180 units in total.

### **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 (both private and affordable) 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 range of private and affordable housing provision at Mayfield.

- **The Council's vision and aims in terms of supporting growth within Midlothian and identified strategic development areas in particular is 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**
- **Barratt Homes and the landowner support the continued allocation of Site h4I (North Mayfield) within the LDP**
- **However, the indicative capacity highlighted within the Proposed LDP for Site h4I should be amended to approximately 180 units based upon the achievable density and net developable area**
- **A greater capacity at Site h4I will contribute significantly to Midlothian's housing land supply shortfall and will also accord with Government guidance and best practice of increased densities with particular regard to efficient use of greenfield housing allocations**
- **The landowner and developer is keen to work with Midlothian Council to agree necessary and proportionate infrastructure requirement to allow for implementation of the site**

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**On behalf of Barratt Homes**

