



MIDLOTHIAN GREEN PARTY

**RESPONSE TO
MIDLOTHIAN LOCAL DEVELOPMENT PLAN
MAIN ISSUES REPORT**

August 2013

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Question1: Vision

The primary focus of the vision set out in the MIR is the facilitation of economic and population growth. However the vision statement notes: "The challenges faced in delivering the scale of growth required in Midlothian are acknowledged."

Sustainability is mentioned in the vision, but only as the last item on the list.

In MGP's view the priorities in the vision should be reversed. If the economic and population growth in the plan cannot be sustained in the long term, whether in environmental or economic resource terms, then facilitating them simply postpones the day when decisions must be taken on achieving a sustainable society in Midlothian and beyond. To illustrate, if the vision for Midlothian is a massive increase in new housing, the needs and demands of those additional residents for roads, retail developments and open space will increasingly come into conflict with each other. This is not a sustainable vision.

The vision should start with the concept of sustainability at its heart. It should ask the question "can we continue this trajectory over the plan period and beyond and still meet our aims in terms of quality of life, transition to a low carbon economy and community engagement?"

Question 2: Aims and objectives

MGP welcomes the addition of "an aim relating to climate change mitigation" in the MLDP Aims and Objectives. However it should be clear enough and specific enough to be an effective driver of planning policy and practice in Midlothian.

The Approved SESPlan has a very general aim relating to climate change: "Contribute to the response to climate change through mitigation and adaptation and promote high quality design / development." The Midlothian aim relating to climate change should go well beyond this. The Midlothian Community Plan already contains a commitment to a 27% reduction in per capita CO2 emissions between 2011 and 2020. The MLDP should support at least this level of reduction and should also state a target for overall emissions in Midlothian, in the context of the Plan's projections for economic and population growth.

The "aim relating to climate change mitigation" should also affirm Midlothian Council's commitment to meet its obligations under Section 44 of the Climate Change (Scotland) Act 2009 to act (a) in the way best calculated to contribute to the delivery of national emissions reduction targets and (b) in a way that it considers is most sustainable.

MGP also welcomes the commitment to an aim relating to implementation of the Central Scotland Green Network. However it is essential that the inclusion of this aim does not lead to a watering down of commitments to protection of the environment and green spaces that are not part of the 'Green Network'. Environmental aims in the MLDP should be applicable across the whole of the Council's policies and practice.

The proposal to include an aim to "recognise the benefits of sustainable place-making" is also welcomed, but it should be strengthened so that "sustainable place-making" is at the heart of planning and decision-making on new development. We also take the view that the term "sustainable place-making" should be clearly defined in the aims, to ensure that its meaning is understood.

MGP proposes adding the following 'Environmental Objective' to those proposed in the MIR: "to secure the Council's commitments to reduction of greenhouse gas emissions through all aspects of its activities, including decision-making on individual planning applications."

MGP also proposes applying the same test to other development proposals as are applied to renewable energy in the 'Environmental Objectives' section, i.e. that these developments are promoted "where this can be achieved in an environmentally acceptable manner". Thus the following Economic Objective would be changed as shown:

- Support Midlothian's growing economy by creating quality and sustainable business locations and providing positively for the expansion of existing enterprises *where this can be achieved in an environmentally acceptable manner.*

Question 3: Sustainable Place-Making

This section of the MIR sets out the strategy for provision of new housing. We believe there are serious questions to be asked about the plan's assumptions about housing demand. The National Registers for Scotland population growth predictions for Midlothian estimate the population in 2020 to be 85,553 – an increase of 5.4% in ten years. However the Environmental Report for the MLDP MIR (para 3.1.5) predicts the Midlothian population to be "in excess of 96,000" by 2021 – an increase of 17% in ten years. These estimates are so out of kilter that they place serious doubt on the dependability of the MLDP's assumptions about housing demand.

There is in our view a significant difficulty in Midlothian meeting the demands placed on it for new housing and simultaneously achieving the laudable aims of "sustainable place-making". In Midlothian, as elsewhere in the country, new housing developments are typically:

- located further away from public transport
- located further away from employment locations
- located further away from shops
- located further away from community facilities
- not provided with local shopping facilities
- designed primarily to accommodate private car ownership and use.

We welcome the commitments under the principle of “sustainable place-making” to address some of these issues. However this will require the establishment of a clear and robust system that forces developers to comply with the Council’s aims in this regard. Developers can be expected to oppose many of the principles since they will increase their costs. It must be clear that developments where, in order to ‘pop out to buy a pint of milk’, residents must get in their car and drive several miles to an out of town supermarket, will not be acceptable.

It should also be clear in the Council’s planning policy that the creation of new housing in Midlothian primarily to meet the needs of people whose employment requires them to commute, especially by car, cannot meet the terms of ‘sustainable place-making’. Midlothian already has very high levels of out-commuting. The Council should be making strenuous efforts to reduce the amount of commuting both in its housing policy and in its policies on employment and provision of shopping and community facilities.

We also propose that the concept of ‘sustainable place-making’ should be strengthened by incorporating an aim of encouraging local and community-based food production and distribution. Many existing housing areas in Midlothian have open spaces that are unused, and also relatively poor access to community/neighbourhood facilities and activities. The Council already has a track record of promoting community gardens connected with schools, hospitals and other activities. This should be extended to establish community-based food production as one of the aims of sustainable place-making. This will have multiple benefits:

- reducing transport demand
- reducing food miles
- reducing family food bills
- promoting community identity, cohesion and resilience
- providing practical environmental and social education
- enhancing social equity.

Question 4: Development Strategy

We believe the development strategy set out in the MIR carries a serious risk of undermining the cohesion and quality of life of a number of existing towns and communities in Midlothian by eroding the rural margins between urban areas and placing strains on community infrastructure.

There are already serious concerns in numerous parts of Midlothian about the pressures on existing communities from new housing and other developments. This is already an issue in Rosewell, Dalkeith, Straiton, Damhead and Easthouses. The protection of green spaces, both within urban areas and by limiting the spread of built-up areas into the countryside, should be prioritised.

Question 5: A701 realignment

We do not support the proposals for realignment of the A701. The rationale for these plans is unclear since on the one hand the road is promoted as being necessary to accommodate increased traffic flows resulting from development in the Straiton area, but on the other, the Council states that the funding of the road would be dependent on contributions from the developers of the West Straiton site. This begs the question, if the Straiton development did not go ahead, would there be a demand for the new road? Developer-led plans, and especially developer-led public infrastructure provision, should be resisted.

As an alternative to building a new section of the A701, the Council should prioritise reduction of road traffic as a strategic aim. In the specific case of transport requirements in the Bush/Damhead/Lothianburn/Straiton area, there is a strong case for dedicated cycle route provision for the large and growing number of people working and studying in and around The Bush. Current routes, particularly along the A702 and A703, are dangerous for cyclists.

Question 6: Penicuik Rail Option

MGP supports the proposal to carry out a feasibility study of a railway route to Penicuik. However we recognise that, given the topography, the legacy of old rail routes and the financial climate, any option is likely to be very costly. The benefits should also be rigorously tested against a council strategic policy of minimising the amount and length of commuting.

Question 7: Retailing

Midlothian currently suffers from a problem common to many areas of Scotland and the rest of the UK – declining fortunes for high street shops, with food and other retail facilities increasingly located in out-of-town retail parks and malls that also struggle to survive due to high rents.

The MLDP proposal to further expand Straiton Retail Park is at odds with the plan's aspirations for sustainability. Encouraging expansion at Straiton will suck demand away from existing Midlothian town centre shops, encourage car use and lead to consumer spending by Midlothian residents being transferred out of the county and the country in the shape of the profits of multinational chains and high rents paid to a property development company registered in an offshore tax haven (Guernsey).

Midlothian's retail strategy should be focused on retaining local choice and local control. This will mean restricting out-of-town developments, mandating local shop provision in new housing developments, and providing economic and planning incentives for independent locally- and community-controlled retail businesses to locate and remain in the existing town high streets.

Much of the proposal for further expansion at Straiton appears to be driven by the developers' desire to attract customers from outside Midlothian, notably the City of

Edinburgh. This is also contrary to the sustainability aims of the MLDP since it encourages car travel and sucks demand out of town centre facilities in Edinburgh.

The recent history of Straiton Park, which is reflected in most developments of this sort across the country, shows that it is not even capable of sustaining the existing businesses on the site, let alone catering for more. Several units on the site have remained empty for a considerable period of time. In this context it makes no sense to propose creating even more retail space of this sort on the same site.

Additionally, the MIR seems to suggest that one rationale for the West Straiton development is that it would generate funds to deliver the realigned A701. However the A701 realignment is also billed as being required in order to support further development at Straiton. These seem to be circular arguments.

In relation to retail development, SESPlan states: “Unless an exception is identified through an LDP and justified by rigorous analysis, priority should be given to town centre then edge of centre locations, then established commercial centres and finally out of centre locations.” The MLDP should adhere to these principles and reject further expansion at Straiton in favour of town centre locations that are within active travel distance of the majority of people they are designed to serve. The plan should also aim to reduce demand for travel for food shopping through promotion of community vegetable production and distribution.

Question 8: Straiton Commercial Hub

The concept of a ‘Midlothian Gateway’ seems poorly defined. Given its location it seems unlikely that it would attract tourists. It is difficult to believe that what is currently described as “an uninspiring entrance to Midlothian” could be made “attractive” by the creation of yet another retail park. If the Council is to support tourist development in this area, it is clear that it should focus on provision of appropriate accommodation for outdoor pursuits on the Pentland Hills rather than the creation of what would in effect be a motorway service station.

Question 9: New Superstore for A7/A68/Borders Rail Corridor

There should be no provision for further out-of-town supermarkets.

Question 10: Town Centres

There should be provision for a switch from retail to non-retail uses in town centres other than Dalkeith but care should be taken to preserve retail provision where possible; any change of use should be limited to community-based functions.

Question 11: Tourist Accommodation

As noted above, the proposal to promote a hotel development at West Straiton is poorly conceived and should not be supported. Paragraph 5.5 of the MIR notes that “there may be a role for other types of accommodation”. This is more appropriate to facilitating and encouraging environmental and activity-based tourism such as snow sports, cycling, walking and pony-trekking on the Pentland Hills. Any such facilities should be located at Hillend and other public transport-accessible locations on the A702.

Question 12: Green Belt

The concept of the Green Belt is limited in scope. It conceives of these areas in negative terms - the absence of development – rather than promoting them as green spaces to provide enjoyment, relaxation, appreciation of nature, bio-diversity, and mitigation for CO2 emissions. It is also flawed because it permits “essential infrastructure”. The Green Belt on the northern boundary of Midlothian is particularly degraded because it is dominated by the Edinburgh City Bypass and two major power lines.

We believe that, despite its limitations, the Green Belt is an important and valuable constraint on urban expansion and should be retained as a key policy measure. It should also be re-cast as the basis for a more positive approach to promotion of green spaces, not just as development-free corridors, but as areas where the aim is to encourage enhancement of the environment, creation of wildlife corridors and protection of agricultural land, and to connect these to other rural parts of Midlothian.

In that context, we do not support deletions of further areas from the Green Belt.

Question 14: Midlothian Green Network

Continued protection for Midlothian’s environment is essential. However the approach set out in both SESPlan and the MLDP, which focuses on identifying particular features as “green infrastructure”, risks defining the environment too narrowly and therefore limiting the protection given to the environment as a whole. In a plan vision which prioritises economic and population growth, the creation of green “networks” looks increasingly like a strategy to provide protection only for a declining number of narrow corridors separating the expanding urban and suburban sprawl.

The notion of green networks is also predicated on travel. Networks are designed to facilitate movement. While the promotion of, and creation of facilities for active travel are a good thing, it is also important to protect ‘green’ areas as part of every community’s living space – as a backdrop for views, and to allow communities to feel part of the environment. It is not necessary to assume any form of travel for green spaces to perform this role. Indeed if they can only be experienced for many people by travelling somewhere, then our priorities are wrong. We should be ensuring that

communities have their own green spaces and that people are able to appreciate the environment within their own neighbourhoods.

Section 8: Climate change

The MLDP's approach to climate change mitigation – the reduction of greenhouse gas emissions – is problematic. While there are proposals to avoid reliance on use of private cars, promote active travel and require new buildings to meet demanding emissions standards, there is no clear plan for Midlothian to achieve its contribution to national emissions reduction targets as it is required to do by Section 44 of the Climate Change (Scotland) Act 2009.

Several aspects of the plan appear to be at odds with reducing carbon emissions. First, the plan envisages a massive increase in road traffic in Midlothian. According to the Environmental Report (para 3.1.23), road traffic in Midlothian increased by 7.4% in the ten years to 2011, but is forecast to rise by 23% in the ten years from 2007 to 2017 and by a further 13% between 2017 and 2032. Even with significant improvements in the emissions performance of vehicles, this will be a major barrier to Midlothian achieving meaningful reductions in emissions over the plan period. It also suggests that the Council expects its policies of discouraging developments that rely on private car use to be a failure. There needs to be a fundamental re-thinking of this policy. Given the already generally good provision of bus services and the financial barriers to significant investment in additional rail services in Midlothian, it is clear that the key to making progress in this area is to reduce demand. It is within the powers of the Council to achieve this within the context of the proposals for sustainable place-making, focusing on redevelopment of town centres, promotion of active travel, and rejecting planning applications for developments that rely on private car use. But these policies need to be made more focused, more rigorous and defined clearly to achieve the aim of reducing the demand for road travel.

Second, while the council is proposing to require developers to build zero- or low-carbon houses and other buildings, the MIR is completely silent about the emissions from non-housing developments – for example, planning applications for business and industrial developments that generate high levels of emissions, such as mineral extraction, haulage facilities and certain industrial processes. These can generate tens of thousands of tonnes of CO₂ a year, with the potential to wipe out emissions reductions in other areas. Without clear and effective controls on non-housing emissions, backed by a rigorous policy, Midlothian's climate change strategy is wide open to failure. To avoid this, all planning applications – perhaps with some exclusions for developments acknowledged to have low emissions - should be required to complete a sustainability appraisal, including accounting for the CO₂ and other greenhouse gas emissions from the development and setting out how the development will contribute to Midlothian's efforts to meet its climate change obligations as set out in the 2009 Act.

The Midlothian Community Plan has set the Council a target of reducing per capita CO₂ emissions from 6.4 tonnes in 2008 to 4.5 tonnes in 2020 – a reduction of 42%. The MLDP should expand on this commitment and propose overall target levels for CO₂ emissions in Midlothian, in addition to per capita levels. This would allow the

Council to focus on the main sources of greenhouse gas emissions in order to control them.

Question 17 - Wind Energy

There should be an independent review of the landscape capacity study for wind turbines, with a view to identifying areas where larger scale turbines could be placed without causing significant adverse effects. This should be carried out in parallel with a commitment to support and facilitate community ownership and control of renewable energy projects, including commercial-scale wind farms. It is clear from experience elsewhere in Scotland that a substantial part of community resistance to onshore wind farm proposals is based on concerns that the developments are promoted by large foreign or multinational companies and that the profits from the enterprise are not retained within the local area. Community ownership is now well-established in Scotland and the rest of the UK and has been shown to deliver not only substantial economic benefits but also the creation of a vehicle for community empowerment and cohesion.

Question 18: Community Renewables and Other Forms of Renewable Energy Development

The MIR's consideration of the opportunities for renewable energy within Midlothian is extremely narrow, consisting of little more than a justification of the Council's adherence to landscape capacity limits on commercial-scale wind farm development.

The potential for renewable energy in Midlothian is considerable and should be fully explored and promoted by the Council. The Solar Meadow project at Jewel & Esk College is a ground-breaking initiative and could be the basis for determining the feasibility of expanding solar energy across the council area. The MIR should acknowledge the importance of this development and promote collaboration with the college to develop further opportunities for solar power.

Midlothian also has significant hydro power potential, with two substantial rivers running through the county. The North Esk provided hydro power for much of Midlothian's paper, explosives and other industries over hundreds of years. The South Esk has several former mills and a number of reservoirs with a significant head of water. There are numerous examples around the UK of modern hydro power technology being successfully established in areas that require sensitivity to environmental impact, leisure access and cultural heritage. Hydro power from Midlothian's river and reservoir assets has the potential to deliver significant savings in greenhouse gas emissions, the creation of local jobs, innovative community-based ownership and control and the enhancement of former mill and industrial sites as community and visitor attractions.

Q19: Mineral Working - Areas of Search for Aggregates and Coal

The proposed approach to opencast coal mining set out in the MIR is now out of date and should be revised. The new draft of Scottish Planning Policy, currently out for consultation, does not state that opencast mining “is in the national interest”. It merely states that “extraction of minerals makes an important contribution to the economy”. In addition, a draft National Planning Framework 3 (NPF3) has been produced which changes the emphasis put on the role of coal-fired power stations in Scotland, and therefore on the demand for opencast coal from Scottish sites.

Paragraph 9.2 of the MIR states that the NPF2 “acknowledges that baseload power stations will have a role to play, given the variable output of some renewable sources of energy.” However this is only a partial account of NPF2’s support for the continuation of coal-fired power stations. Paragraph 152 of NPF2 clearly ties the continued support for coal fired power stations to the development of carbon capture and storage (CCS). However things have moved on since NPF2 was written in 2009. A proposal to convert part of Longannet to CCS was rejected in 2011 and there are now no plans to fit the plant with this technology. Cockerzie Power Station closed in March 2013. The proposed coal-fired CCS power station at Grangemouth has failed to secure EU funding and is only on the reserve list for UK funding. Without it, the project is highly unlikely to go ahead.

The Scottish Government’s draft NPF3 places a significant question mark over the future of the one remaining coal-fired plant at Longannet. It proposes National Development Status for “new non-nuclear base-load capacity at existing power station sites”, not for the existing unabated generating capacity, and also asks, under the question “how can we support the decarbonisation of baseload generation?”: “Is there also a need for Longannet and Cockerzie to retain their national development status as part of a strategy of focussing baseload generation on existing sites?” Again, this is about provision for new power stations, which by definition must be CCS-equipped from the start; and the reference to Cockerzie is to a gas-fired plant, not coal.

To underline this, the central electricity generation scenario in the Government’s 2nd Report on Proposals and Policies for a Low Carbon Scotland (“RPP2”), published in June 2013, envisages Longannet closing in 2020 and no CCS-equipped coal-fired electricity generation in the country until at least 2027.

There is therefore no support in current or proposed national policy for continued opencast coal extraction to feed Scottish power plants over the period of the proposed Midlothian Local Development Plan. Longannet has a limited life; it is likely to close halfway through the plan period; and its demand for coal is likely to decline in the run-up to closure. In that context, cementing a capacity to dig many millions of tonnes of coal out of Midlothian over a period stretching through to 2024 or beyond is unsupportable.

In addition, developments in the Scottish opencast industry during 2013 have shown that the arrangements put in place to mitigate the environmental impact of opencast mining and secure the restoration of worked-out mines have failed, and that there is now major doubt that the industry’s economics can support coal extraction and the

full funding of restoration commitments. In these circumstances it is our view that the designation of new Areas of Search for opencast coal in Midlothian, as proposed in the MIR, would be wholly inappropriate and indeed irresponsible. Further, in view of the major uncertainties in the industry, the existing Areas of Search should be suspended. If this is not done, communities in and around Areas of Search will be subjected to continued uncertainty and potential planning blight for years to come.

Opencast coal extraction is also contrary to the council's commitments under Section 44 of the Climate Change (Scotland) Act. The burning of millions of tonnes of coal cannot be considered sustainable by any definition, and would be wholly contrary to the aim of contributing to national emissions reduction targets. But even if the burning of Midlothian coal in Longannet power station is considered not to be Midlothian's problem, the emissions generated solely by the excavating plant used to extract the coal would in themselves make it impossible for Midlothian to contribute to emissions reductions.

The alternative to identifying Areas of Search for opencast coal is to prioritise the development of all forms of renewable energy; instigate policies to reduce the demand for road transport; apply stringent emissions performance standards for new houses; provide support for retrofitting buildings with insulation and low carbon energy technology; and require all planning applications to demonstrate their emissions performance through sustainability appraisals.

Q20 - Onshore Gas Extraction

The MIR also seeks views on how council planning policy should deal with applications for coal bed methane and other gas and coal gasification development. Our view is that, in line with government policy, Midlothian should focus on the development of renewable energy. All forms of oil and gas production are non-renewable both in terms of their carbon and other greenhouse gas emissions and in terms of the replaceability of the resource. Encouragement of fossil fuel energy production cannot be sustainable and should therefore be discouraged. Midlothian should therefore develop a strong, separate policy on the assessment of oil and gas extraction proposals, based on a rigorous sustainability appraisal that judges the contribution of these developments to CO₂ and other greenhouse gas emissions – including methane releases - as well as their local environmental impacts, for example on water quality.

Question 21: Infrastructure

Transport proposals in the MIR are focused on new roads provision. As noted above in our comments on 'sustainable place-making', the projected scale of increase in road traffic in Midlothian needs to be radically re-assessed. It is now universally accepted that construction of new roads merely creates additional demand to fill the new capacity. Similarly, creating new housing, retail and industrial/commercial developments that encourage road transport inevitably generate a demand for new roads, but the provision of more road capacity is not a solution. The solution lies in

re-thinking the spatial relationships between new housing, shopping and employment areas, with a focus on reducing demand for road transport.

Question 24: Affordable Housing

A requirement for 25% of all new housing developments to be “affordable” is reasonable, but is a sad reflection on the national situation that all local authorities are dependent on private developers to deliver the housing that is most needed to address council house waiting lists.

There should be close attention paid to the definition of “affordable”, given that these houses will be built as add-ons to private housing developments.

Question 25: Housing Amenity

The Council should ensure that all new housing meets zero carbon standards and that all housing developments incorporate adequate communal green spaces, including areas suitable for food production.

Tenants of residential park homes should be afforded more protection. The Council should pay close attention to the impacts of new developments on these communities, which may have insecure tenancies and limited alternative housing options.

Question 26: Employment Land

The Council’s policy on employment land focuses on the use class designation of particular sites. Consideration should also be given to a more flexible and integrative approach to business/employment premises, facilitating enterprises in a variety of locations where the proposed activity meets other policy goals, such as reducing demand for road transport, meeting local needs, community involvement and contributing to reduction in greenhouse gas emissions.

Question 30: River Valley Policy

MGP does not support the modification of the river valley policy proposed in this section of the MIR. As the MIR points out, the urban areas of the Esk Valley have an important working history. The council should be building on that history to create combined renewable energy and cultural heritage developments in the river valleys. There is no reason why this cannot be done within the scope of the existing policy. Any relaxation of the policy could lead to sterilisation of areas that might otherwise support important hydro power and related projects.

Question 31: Hillend Country Park/ Midlothian Snowsports Centre

MGP supports the promotion of wider rural leisure activities around Hillend and associated with the Country Park. However these should be strictly controlled to guard against over-commercialisation. Supplementary planning guidance would be appropriate.

Question 32: Special Landscape Areas

The proposal to delete the south-west part of the Rosewell-Carrington spur from AGLV designation is based on the fact that it “has been affected by past and current opencast coal mining and this, together with the broad and simple pattern of farmland and mixed linear shelterbelts characteristic of this area, results in a lower scenic quality than the more richly patterned farmland and woodlands found in the Rosewell/Carrington Spur to the north-east and the South Esk Valley.”

This is a poor basis for policy change on landscape designations. The operator of the Newbigging and Shewington opencast mines, now in liquidation, was duty bound by its planning consent to restore the land to at least its former quality. However it sought to extend the period allowed to complete the restoration, then abandoned the site, leaving it largely unrestored and with no plan to complete the restoration. So it would appear that the Council, having consented these opencast mine developments inside an AGLV in the first place, and then having failed to enforce the restoration of these planning consents, now seems to be accepting that these parts of the AGLV will never be restored and therefore ought not to have their AGLV status removed. What the Council ought to have done instead is to protect its own landscape designations by refusing consent for inappropriate development such as opencast mining in these areas; and then, if they had failed to do that, they should have enforced their own planning conditions, ensuring that the landscape could be returned to a quality appropriate to an AGLV.

But the proposed removal of this section of AGLV cannot be fully explained by the Council’s failures in relation to “past and current” opencast mining. Much of the proposed deletion relates to Edgelaw Moor, which has not been subject to recent opencast mining and is characterised by open fields with mature beech tree shelter belts. It is, however, part of the proposed new Area of Search for opencast coal put forward by Scottish Coal in 2012 and the subject of the current planning application for opencast mining at Cauldhall. The boundary of the proposed deleted AGLV is exactly the same as the boundary of the Cauldhall application. This is wholly inappropriate. Landscape designations should not be changed in order to facilitate possible future development that is not compatible with an AGLV or SLA.

The original AGLV boundary in the Shewington-Edgelaw area should be retained. If AGLVs and SLAs are changed in order to accommodate past and future Council acceptance of inappropriate development, there is no point in having the designations.
